PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Capitol Products Corporation
508 W. Wilson Street
Kentland, Indiana 47951

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 111-5887-00005	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary aluminum extrusion and anodizing source.

Responsible Official:	Kenneth A. Wampler
Source Address:	508 W. Wilson Street, Kentland, Indiana 47951
Mailing Address:	P.O. Box 106, Kentland, Indiana 47951
SIC Code:	3354, 3471
County Location:	Newton
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) electrostatic paint spray booth 1, known as paint 1, booth 1, installed in 1984, equipped with electrostatic disc spray guns and dry filters for overspray control, exhausted to S-13, capacity: 15,120 pieces of aluminum per hour.

(b) One (1) electrostatic paint spray booth 2, known as paint 1, booth 2, installed in 1984, equipped with electrostatic disc spray guns and dry filters for overspray control, exhausted to S-14, capacity: 15,120 pieces of aluminum per hour.

(c) One (1) anodizing line, known as ANOD-1, installed in 1984, exhausted to S-15 controlled by a voluntary scrubber, S-16 and into the building, consisting of the following twenty-seven (27) tanks containing various liquids, maximum capacity: 30,000 pounds of aluminum parts per hour:

(1) One (1) Brite dip tank and one (1) Brite dip rinse tank equipped with a voluntary scrubber.

(2) Two (2) anodize tanks containing sulfuric acid and water, equipped with a voluntary scrubber.

(3) One (1) color tank containing sulfuric acid or a stannous sulfate solution and water.

(4) One (1) gold dye tank containing ferric sodium oxalate and water.

(5) Two (2) seal tanks each containing nickel and water or hydrogen fluoride and water.

(6) One (1) alkaline cleaner tank.

(7) One (1) etch tank containing NaOH and water, equipped with a voluntary scrubber.

(8) One (1) desmut tank containing nitric acid, phosphoric acid, sulfuric acid and water.

(9) Sixteen (16) rinse tanks, using only water and obtaining materials from upstream processing tanks as part of the rinsing operation.

(d) One (1) anodizing boiler, known as ANOD-2, fueled by natural gas and propane as a back up fuel, installed in 1984, exhausted to S-12, heat input capacity: 8.4 million British thermal units per hour.

(e) One (1) billet heater, known as EXTR-1, heater H, fueled by natural gas and propane as a back up fuel, installed in 1991, exhausted to stack S-3, heat input capacity: 8.0 million British thermal units per hour.

(f) One (1) paint bake oven, known as paint 3, paint bake oven P, fueled by natural gas and propane as a back up fuel, installed in 1984, exhausted to S-11, heat input capacity: 9.0 million British thermal units per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6. One (1) self-contained parts washer, installed after January 1, 1980, equipped with a remote solvent reservoir.

(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(c) Other activities or categories with emissions below insignificant thresholds:

(1) Six (6) extrusion sawing stations, capacity: 5.0 tons per hour, each.

(2) One (1) debridging sawing operation, capacity: 3.5 tons per hour.

(3) One (1) extrusion chop saw, capacity: 5.0 tons per hour.

(4) Drilling and machining operations, capacity: 2.5 tons per hour, total.

(5) One (1) woodworking saw, 0.25 tons per hour.

(6) Paint pretreatment system.

(7) One (1) deburring machine, installed in 1997, capacity: 0.25 tons per hour.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled “Permit Shield.”

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source’s potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

(a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was based on continuous or intermittent data;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);

(5) Any insignificant activity that has been added without a permit revision; and

(6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

(1) The applicable requirements are included and specifically identified in this permit; or

(2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

(2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM,, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Operational Flexibility [326 IAC 2-7-20]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-1.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions;

(4) Any permit term or condition that is no longer applicable as a result of the change; and

(5) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.22 Construction Permit Requirement [326 IAC 2]

A modification, construction, or reconstruction shall be approved if required by and in accordance with the applicable provisions of 326 IAC 2. The Permittee had previously been issued two (2) permits: Operating Permit 56-07-91-0049 and Construction Permit 111-2823-00005.

B.23 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act and IC 13-14-2-2, sample or monitor, at reasonable

times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

(2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.24 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) IDEM, OAM, shall reserve the right to issue a new permit.

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity, excluding water vapor, shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. The provisions of 326 IAC 9-1-2 are not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year

or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

(a) Has certified that all facilities at this source are in compliance with all applicable requirements; and

(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and

(c) Will comply with such applicable requirements that become effective during the term of this permit.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If

due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

(A) Response steps that will be implemented in the event that compliance

related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within “normal” parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM

that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

(a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and

sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the

Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with

the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

The information describing the processes contained in this facility description box is descriptive information and does not constitute enforceable conditions.

(a) One (1) electrostatic paint spray booth 1, known as paint 1, booth 1, installed in 1984, equipped with electrostatic disc spray guns and dry filters for overspray control, exhausted to S-13, capacity: 15,120 pieces of aluminum per hour.

(b) One (1) electrostatic paint spray booth 2, known as paint 1, booth 2, installed in 1984, equipped with electrostatic disc spray guns and dry filters for overspray control, exhausted to S-14, capacity: 15,120 pieces of aluminum per hour.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied to the aluminum parts shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for each twenty-four (24) hour block, with 24 hour block running consecutively, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

(a) Pursuant to CP 111-2823-00005, issued on November 5, 1993, the VOC usage at the two (2) electrostatic paint spray booths shall be limited to 246 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive months. This usage limit is required to limit the potential to emit of VOC to less than 246 tons per twelve (12) consecutive months. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

(b) Operation Condition 5 of CP 111-2823-00005, issued on November 5, 1993, which states that there is a monthly VOC limit is replaced by (a) of this condition which contains an annual limit based on a twelve (12) consecutive month total.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to CP 111-2823-00005, issued on November 5, 1993, the particulate matter (PM) from the two (2) electrostatic paint spray booths shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 VOC Emissions

Compliance with Condition D.1.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) months.

D.1.8 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the two (2) electrostatic paint spray booths are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S-13 and S-14) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken for each twenty-four (24) block and monthly, as indicated below, and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Conditions D.1.1 and D.1.2.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each twenty-four (24) hour block, with 24 hour blocks running consecutively;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month; and

(6) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Conditions D.1.8 and D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

The information describing the processes contained in this facility description box is descriptive information and does not constitute enforceable conditions.

(c) One (1) anodizing line, known as ANOD-1, installed in 1984, exhausted to S-15 controlled by a voluntary scrubber, S-16 and into the building, consisting of the following twenty-seven (27) tanks containing various liquids, maximum capacity: 30,000 pounds of aluminum parts per hour:

(1) One (1) Brite dip tank and one (1) Brite dip rinse tank equipped with a voluntary scrubber.

(2) Two (2) anodize tanks containing sulfuric acid and water, equipped with a voluntary scrubber.

(3) One (1) color tank containing sulfuric acid or a stannous sulfate solution and water.

(4) One (1) gold dye tank containing ferric sodium oxalate and water.

(5) Two (2) seal tanks each containing nickel and water or hydrogen fluoride and water.

(6) One (1) alkaline cleaner tank.

(7) One (1) etch tank containing NaOH and water, equipped with a voluntary scrubber.

(8) One (1) desmut tank containing nitric acid, phosphoric acid, sulfuric acid and water.

(9) Sixteen (16) rinse tanks, using only water and obtaining materials from upstream processing tanks as part of the rinsing operation.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to the exemption issued on September 14, 1981, the registration issued on April 26, 1982, and 326 IAC 6-3, the allowable particulate matter (PM) emission rate from the one (1) anodizing line, known as ANOD-1 shall not exceed 25.2 pounds per hour when operating at a process weight rate of 15 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour.

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

The information describing the processes contained in this facility description box is descriptive information and does not constitute enforceable conditions.

(d) One (1) anodizing boiler, known as ANOD-2, fueled by natural gas and propane as a back up fuel, installed in 1984, exhausted to S-12, heat input capacity: 8.4 million British thermal units per hour.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 8.4 million British thermal units per hour heat input boiler shall be limited to 0.6 pounds per million British thermal units heat input.

This limitation is based on the following equation:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

D.3.2 Fuel Type

Only natural gas or propane shall be fired in the one (1) anodizing boiler, known as ANOD-2.

Compliance Determination Requirements

D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - Insignificant Activities

The information describing the processes contained in this facility description box is descriptive information and does not constitute enforceable conditions.

(a) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6. One (1) self-contained parts washer, installed after January 1, 1980, equipped with a remote solvent reservoir.

(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(c) Other activities or categories with emissions below insignificant thresholds:

(1) Six (6) extrusion sawing stations, capacity: 5.0 tons per hour, each.

(2) One (1) debridging sawing operation, capacity: 3.5 tons per hour.

(3) One (1) extrusion chop saw, capacity: 5.0 tons per hour.

(4) Drilling and machining operations, capacity: 2.5 tons per hour, total.

(5) One (1) woodworking saw, 0.25 tons per hour.

(6) Paint pretreatment system.

(7) One (1) deburring machine, installed in 1997, capacity: 0.25 tons per hour.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator of the one (1) self-contained parts washer equipped with a remote solvent reservoir shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.4.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the six (6) extrusion sawing stations, one (1) debridging sawing operation, one (1) extrusion chop saw, drilling and machining operations, one (1) woodworking saw, paint pretreatment system, one (1) deburring machine, and the following equipment related to manufacturing

activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment, shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour.

(b) The requirement from CP 111-2823-00005, issued on November 5, 1993, Operation Condition 9, that established a 7.58 pounds per hour particulate matter emission limitation from the fuel combustion units other than the anodizing boiler and stated that particulate matter emissions will be considered in compliance with 326 IAC 6-3-2 provided that visible emissions do not exceed 20% opacity, is not applicable because particulate emissions from the fuel combustion units result solely from combustion and not from a production process. Fuel use is not counted towards process weight rate. Therefore, the requirements of 326 IAC 6-3-2 are not applicable to the fuel combustion units.

Compliance Determination Requirement

D.4.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.4.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Capitol Products Corporation
Source Address: 508 W. Wilson Street, Kentland, Indiana 47951
Mailing Address: P.O. Box 106, Kentland, Indiana 47951
Part 70 Permit No.: T111-5887-00005

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Capitol Products Corporation
Source Address: 508 W. Wilson Street, Kentland, Indiana 47951
Mailing Address: P.O. Box 106, Kentland, Indiana 47951
Part 70 Permit No.: T111-5887-00005

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (**10**) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Monthly Report
(Submitted Quarterly)

Source Name: Capitol Products Corporation
Source Address: 508 W. Wilson Street, Kentland, Indiana 47951
Mailing Address: P.O. Box 106, Kentland, Indiana 47951
Part 70 Permit No.: T111-5887-00005
Facility: Two (2) electrostatic paint spray booths
Parameter: the volume weighted average VOC content of coating applied to the aluminum parts for each twenty-four (24) hour block, with 24 hour blocks running consecutively
Limit: 3.5 pounds of VOCs per gallon of coating less water

Month:_____Year:_____

Day				Day			
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

9 No deviation occurred in this month.
9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Capitol Products Corporation
Source Address: 508 W. Wilson Street, Kentland, Indiana 47951
Mailing Address: P.O. Box 106, Kentland, Indiana 47951
Part 70 Permit No.: T111-5887-00005
Facility: Two (2) electrostatic paint spray booths including cleanup activities
Parameter: VOC usage
Limit: 246 tons of VOC per twelve (12) consecutive months

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Capitol Products Corporation
Source Address: 508 W. Wilson Street, Kentland, Indiana 47951
Mailing Address: P.O. Box 106, Kentland, Indiana 47951
Part 70 Permit No.: T111-5887-00005

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	**Number of Deviations**	**Date of Each Deviation**

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for a Part 70 Operating Permit

Source Name:	**Capitol Products Corporation**
Source Location:	**508 W. Wilson Street, Kentland, Indiana 47951**
County:	**Newton**
SIC Code:	**3354, 3471**
Operation Permit No.:	**T 111-5887-00005**
Permit Reviewer:	**CarrieAnn Ortolani**

On October 21, 1998, the Office of Air Management (OAM) had a notice published in the Newton County Enterprise, Kentland, Indiana, stating that Capitol Products Corporation had applied for a Part 70 Operating Permit to operate an aluminum extrusion and anodizing source with dry filters and a scrubber as controls. The notice also stated that OAM proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

On November 23, 1998, Kenneth Wampler of Capitol Products Corporation submitted comments on the proposed Part 70 Operating Permit. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**. The comments are as follows:

Comments Regarding Issues Specific to the Capitol Products Facility.

Comment 1:

General comment regarding regulatory status of scrubbers.
Sections A and D.2 of the permit list the brite dip scrubbers, anodizing scrubbers, and etch tank scrubber as control devices. Condition C.6 requires operation of all listed control devices at all times in which associated equipment is in operation. Furthermore, Condition D.2.3 indicates that the purpose of these scrubbers is to control particulate matter emissions and specifically requires their continuous operation during operation of the associated process lines. The purpose of the scrubbers is not to comply with particulate limits but instead to control emissions of NOx, sodium hydroxide, and sulfuric acid, pollutants that are not subject to emission limits or other regulatory requirements at Capitol's facility. In fact, potential emissions of particulates calculated from these lines were below applicable emission limits even without taking the scrubbers into consideration, as the Technical Support Document indicates. Accordingly, these devices should be considered voluntary and should not be subject to any requirements under this permit Capitol requests that all reference to the scrubbers be deleted from Sections A.2 and D.2. of the permit, and that Condition D.2.3. be deleted entirely. If reference to the scrubbers in this permit is retained, Capitol requests that specific language exempting these units be placed in Condition C.6.

Response 1:

Operation of the scrubbers is not required in order for the anodizing line to comply with 326 IAC 6-3-2, Process Operations, or any other applicable rules. The scrubbers will remain in the Facility Descriptions in Sections A.2 and D.2 as voluntary control device. Condition D.2.3 has been removed from the permit. Condition C.6 states "All air pollution control equipment listed in this

permit and used to comply with an applicable requirement..." Since the scrubbers are not used to comply with an applicable rule, they are not addressed by Condition C.6.

The facility description is revised as follows:

(c) One (1) anodizing line, known as ANOD-1, installed in 1984, exhausted to S-15 controlled by a **voluntary** scrubber, S-16 and into the building, consisting of the following twenty-seven (27) tanks containing various liquids, maximum capacity: 30,000 pounds of aluminum parts per hour:

(1) One (1) Brite dip tank and three (3) Brite dip rinse tanks, with the Brite dip tank and the primary Brite dip rinse tank equipped with a **voluntary** scrubber.

(2) Two (2) anodize tanks containing sulfuric acid and water, equipped with a **voluntary** scrubber.

(3) One (1) color tank containing sulfuric acid or color max or other stannous sulfate solutions and water.

(4) One (1) gold dye tank containing ferric sodium oxalate and water.

(5) Two (2) seal tanks each containing nickel and water or hydrogen fluoride and water.

(6) One (1) alkaline cleaner tank.

(7) One (1) etch tank containing NaOH and water, equipped with a **voluntary** scrubber.

(8) One (1) desmut tank containing nitric acid, phosphoric acid, sulfuric acid and water.

(9) Fourteen (14) rinse tanks, using only water and obtaining materials from upstream processing tanks as part of the rinsing operation.

Condition D.2.3 has been removed as follows:

~~D.2.3 Particulate Matter (PM)~~

~~The scrubber for PM control shall be in operation at all times when the one (1) Brite dip tank, three (3) Brite dip rinse tanks, two (2) anodize tanks, and one (1) etch tank are in operation and exhausting to the outside atmosphere.~~

Comment 2:

Condition A.2.

As explained in the general comment regarding scrubbers, Capitol believes that all references to scrubbers should be deleted from the permit. If reference to the scrubbers is retained, however, paragraph (c)(1) should be revised to show only one of the three brite dip rinse tanks exhausting to the scrubber. The brite dip scrubber controls emissions from the brite dip tank and the first or "primary" brite dip rinse tank. Since the purpose of the rinse tanks is simply to remove the brite dip chemicals from metal by rinsing, they contain only water and whatever materials are rinsed from the product. As would be expected, the secondary and tertiary rinse tanks contain much lower

concentrations of chemicals from the brite dip tank and thus need not be exhausted to the scrubber.

For purposes of clarification, Capitol wishes to note that three of the tanks listed in condition A.2.(c)(9) do not contain only water, although water is the only material that is purposefully added to those tanks. Certain countercurrent rinse tanks can each pick up significant amounts of materials from upstream processing tanks as part of their rinsing operation. These tanks are the first rinse tank after the anodizing tank, the first rinse tank after the Two-Step (color) tank, and the first rinse tank following the etch tank. The remaining rinse tanks will contain much smaller concentrations of process materials.

In addition, paragraph (c)(3) needs to be revised to clarify that Capitol may use stannous sulfate solutions other than that sold under the trade name "ColorMax." Paragraph (c)(6) also needs to be revised by replacing the word "caustic" with "alkaline." Paragraph (c)(8) needs to be revised to clarify that the desmut tank contains nitric acid, phosphoric acid, sulfuric acid, and water. Because the secondary and tertiary rinse tanks are no longer included in Paragraph (c)(1), Paragraph (c)(9) should be corrected to show that there are 16 "additional" rinse tanks, not 14, that use only water and no other chemicals added (except those added through inadvertent carryover as described in the previous paragraph).

Response 2:

Because the desmut tank contains nitric acid, phosphoric acid, sulfuric acid, and water, the potential PM emissions from the anodizing line have increased to approximately 4.10 pounds per hour, 18.0 tons per year. There is a negligible change to emissions after controls. Therefore, Section A.2(c) and the facility description in Section D.2 have been revised as follows and there are no other changes to the permit:

(c) One (1) anodizing line, known as ANOD-1, installed in 1984, exhausted to S-15 controlled by a voluntary scrubber, S-16 and into the building, consisting of the following twenty-seven (27) tanks containing various liquids, maximum capacity: 30,000 pounds of aluminum parts per hour:

(1) One (1) Brite dip tank and ~~three (3)~~ **one (1)** Brite dip rinse tank~~s~~ equipped with a **voluntary** scrubber.

(2) Two (2) anodize tanks containing sulfuric acid and water, equipped with a **voluntary** scrubber.

(3) One (1) color tank containing sulfuric acid or ~~color max~~ **a stannous sulfate solution** and water.

(4) One (1) gold dye tank containing ferric sodium oxalate and water.

(5) Two (2) seal tanks each containing nickel and water or hydrogen fluoride and water.

(6) One (1) ~~caustic~~ **alkaline** cleaner tank.

(7) One (1) etch tank containing NaOH and water, equipped with a **voluntary** scrubber.

(8) One (1) desmut tank containing nitric acid ~~and water~~, phosphoric acid ~~and water~~,

~~or~~ sulfuric acid and water.

(9) ~~Fourteen (14)~~ **Sixteen (16)** rinse tanks, using only water **and obtaining materials from upstream processing tanks as part of the rinsing operation.**

Comment 3:

Condition B.14.

Paragraph (b)(2) makes reference to the permit containing determinations that certain requirements do not apply to the facility. However, the permit does not contain any such determinations. Capitol has prepared proposed determinations for its facility and requests that they be made an exhibit to the permit and expressly incorporated by reference in Paragraph (b)(2). A copy of proposed Determinations of Inapplicability is enclosed.

Response 3:

Condition B.14(b) requires that either,

(1) The applicable requirements are included and specifically identified in this permit; or

(2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

However, an attachment has been added to the permit as "Attachment 1 of T111-5887-00005, Determination of Inapplicability" in response to this request.

Comment 4:

Condition C.10.
This condition does not appear to be intended to create any new requirements for Capitol, but merely to document that Capitol does not need a compliance schedule since it is in compliance with applicable requirements. However, Capitol is concerned that Paragraph (c) could arguably be interpreted to state that the permit requires the permittee to comply with requirements that become applicable during the term of the permit. This presumably is not IDEM's intent in drafting this provision since new requirements do not become part of the permit until they are incorporated in a revised, reopened, or renewed permit. Such a requirement would certainly not be necessary to ensure that requirements that later become applicable will be enforceable in their own right since they will become enforceable as soon as they become applicable. The permit shield language in Condition B.14 certainly would not bar enforcement for requirements that become applicable after the permit is issued since it applies only to requirements that apply "as of the date of permit issuance." In fact, providing that new requirements will become immediately enforceable under the permit would be inappropriate because they are not covered by the permit shield. It would be inequitable to apply the enforcement mechanisms of this permit to new requirements without conversely applying benefits under the permit such as the permit shield. IDEM's Title V regulations do not authorize such a interpretation of this permit.

Since this condition appears unnecessary and creates possible enforcement ambiguities in this permit, Capitol requests that it be deleted. At a minimum, Capitol requests that the following sentence be added to Paragraph (c) of this condition: "Any such newly applicable requirements will not be considered a part or this permit or enforceable hereunder until such requirements have been

incorporated into the permit."

Response 4:

Pursuant to 326 IAC 2-7-4(c)(11)(A)(ii), the Compliance Schedule Condition must state that the source will meet all applicable requirements that become effective during the term of the Part 70 permit on a timely basis.

Comment 5:

Condition D.1.1.
This condition provides a daily averaging time based on a calendar day. Capitol requests that compliance be determined based on a production day rather than a calendar day in keeping with current practice and for reasons of practicality. Production days coincide with the beginning and end of shifts rather than the beginning of a calendar day. Records of VOC usage are compiled "per shift" at the end of each shift. Basing record keeping on production days allows Capitol to continue this practice, and allows personnel on each shift to calculate totals based on what they used during their own shift rather than requiring them to calculate VOC usage in portions of two shifts.

Use of a production day will not have any impact upon compliance issues since it will not change the averaging time for this requirement and will still assure that the operations comply on a daily basis. The regulations do not prohibit this approach. Accordingly, Capitol requests that the language "calendar day" be replaced with the language "production day as defined by plant practice, provided that no production day may exceed 24 hours in duration."

Response 5:

The frequency of calendar day may be replaced with twenty-four (24) hour period or twenty-four (24) hour block provided the 24 hour periods run consecutively. Condition D.1.1 has been revised as follows:

D.1.1 Volatile Organic Compound (VOC) [326 IAC 8-2-9]
Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied to the aluminum parts shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for ~~any calendar day~~, **each twenty-four (24) hour block, with 24 hour blocks running consecutively,** for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Comment 6:

Condition D.1.2
This Condition contains a VOC limitation of 246 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive months. This limit was set to avoid triggering review under the Prevention of Significant Deterioration program by assuring that this source will not become a major stationary source. As indicated in previous correspondence during the permit development process, Capitol is interested in ways of better ensuring that future changes outside the painting area do not cause plant wide potential emission to exceed 250 tpy. Capitol would like

to replace this limit with a source-wide limit of 249 tons of VOC per year. Capitol would be interested in this option if associated record keeping requirements were not unduly burdensome. We would like to work with IDEM to determine what record keeping may be appropriate.

Response 6:

In order to ensure that VOC emissions from the entire plant are less than 250 tons per year, the emissions from the paint area have been limited so that the remaining emission units may operate at full potential, as described by the Part 70 permit application, and not result in source-wide emissions of 250 tons per year or more. The source is concerned that processes will be added in the future that will result in the source becoming a major source pursuant to 326 IAC 2-2, Prevention of Significant Deterioration (PSD). Since the future emissions can not be foreseen at this time, it is only possible to apply a limit to all processes currently existing. Therefore, future modifications will result in limits that, upon the Permittee's request, will keep the source a minor source pursuant to 326 IAC 2-2, PSD. Any change or modification that will increase the potential to emit VOC to 250 tons per year or more will cause the source to be a major source pursuant to 326 IAC 2-2, PSD.

Comment 7:

Condition D.1.8.
Capitol believes that this condition should be deleted because it appears to rely on the assumption that an emission unit is in violation of its emission limits whenever a control device is not in operation. Please see the comments regarding Condition C.6 in the General Conditions section of this document for a more detailed discussion. Since this condition is not based upon any provision of Indiana's SIP or other federally enforceable regulation, it should be deleted or, at a minimum, made state-only enforceable.

Response 7:

The dry filters for PM control must be operated in order for the source to show that the source is a minor source pursuant to 326 IAC 2-2, Prevention of Significant Deterioration. Potential PM emissions prior to controls are 580 tons per year. There are no changes to the permit as a result of this comment.

Comment 8:

Condition D.1.9.
Capitol Products requests that the requirement in D.1.9(a) to monitor the performance of the dry filters by observing the stacks for overspray be replaced with a requirement for daily observation of the position and condition of the filters. Inspecting the filters is a much more accurate indicator of whether there is a problem with the control equipment or whether maintenance is needed than visually inspecting the emissions from the stack. Furthermore, requiring daily inspections on the roof of the facility to ensure that filters are functioning properly is unnecessarily burdensome since daily observation of the position and condition of the filters is made at the ground level.

The weekly inspections to document the presence of excessive overspray on the rooftops called for in Paragraph (b) of this condition would not provide any useful information regarding control device function. Some overspray from the stacks is expected and is considered permissible and appropriate under applicable emission limits for painting operations. As a practical matter, rooftops adjacent to stacks associated with painting operations show considerable staining due to historic accumulation of overspray. Weekly inspections would not provide any useful information because

an increase in overspray levels would not produce a discernible change in the appearance of the roof as compared to overspray resulting from historic operations. Since the permit already requires daily inspections to confirm proper function of the control devices, the rooftop inspections set forth in Paragraph (b) are unnecessary and would provide no helpful information. Capitol requests that Paragraph (b) be deleted.

Response 8:

Properly operating the air pollution controls that are already in place is generally adequate to demonstrate compliance with 326 IAC 6-3 in lieu of a stack test and also assures compliance with applicable rules limiting fugitive dust, opacity, and (when necessary) Potential to Emit. The OAM believes that checking the placement and integrity of the filters once a day is a very effective means of ensuring proper operation and ongoing compliance. The OAM has re-evaluated the other compliance monitoring provisions related to evidence of actual emissions from the paint booths and believes that less resource intensive provisions are appropriate. The frequency of visible emissions evaluations has been changed from daily to weekly. The frequency of inspections of rooftops or other surfaces for a noticeable change in solids deposition has been changed from weekly to monthly. IDEM has decided to make the following changes in the monitoring frequencies in Condition D.1.9:

D.1.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray from the surface coating booth stacks (S-13 and S-14) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

As a result of this change, Condition D.1.10(b) has been revised as follows:

(b) To document compliance with Conditions D.1.8 and D.1.9, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily and ~~weekly~~ **monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

Comment 9:

Condition D.1.10

To be consistent with the changes requested for Condition D.1.1, Capitol requests that the following

sentence be inserted at the end of the introductory language of Paragraph (a) of this condition: "Daily records shall be maintained on the basis of a production day as defined in Condition D.1.1."

Response 9:

Condition D.1.10(a) has been revised as follows:

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken ~~daily~~ **for each twenty-four (24) block** and monthly, as indicated below, and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Conditions D.1.1 and D.1.2.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each ~~day;~~ **twenty-four (24) hour block, with 24 hour blocks running consecutively**;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month; and

(6) The weight of VOCs emitted for each compliance period.

Comment 10:

Condition D.1.11
To be consistent with the changes requested for Condition D.1.1, Capitol requests that the following sentence be inserted at the end of this condition: "Daily reporting for VOC usage in that form shall be made on the basis of a production day as defined in Condition D.1.1."

Response 10:

Condition D.1.11 does not need to be changed. The parameter on the report form, on page 41 of 43 of the permit, has been revised as follows:

Parameter: the ~~daily~~ volume weighted average VOC content of coating applied to the aluminum parts for **each twenty-four (24) hour block, with 24 hour blocks running consecutively**

Comment 11:

Facility Description in Section D.2.
This section contains the same descriptive language to which Capitol's comments regarding Condition A.2. were directed. Capitol requests that the same changes be made to this description.

Response 11:

See responses 1 and 2.

Comment 12:

Condition D.2.3.
As explained in the general comment regarding scrubbers, this condition should be deleted because the scrubbers are voluntary control devices that are not needed to comply with particulate limits.

If IDEM does not delete this condition, it should, at a minimum, exempt violations of this condition from reporting as deviations or clarify how the permittee is to determine when a deviation has occurred. Since this condition is not based upon any provision of Indiana's SIP or other federally enforceable regulation, it should be made state-only enforceable if it is not deleted.

Furthermore, as explained in the comments regarding Condition A.2.(c), only one of the three brite dip Rinse tanks exhausts to the scrubber. If retained, this condition needs to be revised so that it refers to one rinse tank only. Finally, if this condition is retained, Capitol requests that the following sentence be inserted at the end of this condition: "For purposes of this Condition and Condition C.6, each brite dip tank, anodizing tank, and etching tank is considered to be in operation only at such times in which metal product is being processed within such tank or when metal is being placed in or removed from such tank." Due to the low vapor pressure of their contents (sulfuric acid for the anodizing tanks and sodium hydroxide for the etch tanks), these tanks generate negligible emissions when the metal is not being processed or moved into or out of these tanks.

Response 12:

See responses 1 and 2.

Comment 13:

Comment regarding Boiler Certification Form
Neither the permit nor any underlying applicable requirements require Capitol to record the dates of alternate fuel (propane) combustion. Capitol requests deletion of the Natural Gas Fired Boiler Certification form from the compliance reporting forms. The propane fuel usage will be documented in the annual emission statement as required in Condition C.17.

Response 13:

To indicate compliance with 326 IAC 5-1 when the boiler is burning natural gas for fuel, a natural gas boiler certification was included in the permit. Since the boiler has a capacity less than 10 million British thermal units per hour and the boiler may only burn natural gas or propane pursuant to Condition D.3.2, a Natural Gas Fired Boiler Certification is not required to show compliance with the rule. Therefore, the Natural Gas Fired Boiler Certification Form has been removed from the permit.

Comments Regarding General Conditions That Would Apply to Any Facility.

Section B.

Comment 14:

Condition B.12

Paragraph (b) of this condition is not based upon any regulatory requirement. 326 IAC 1-6-3 requires facilities to "prepare" and to "maintain" a preventive maintenance plan. There is no regulatory authority to make "implementing" such a plan an enforceable requirement. Furthermore, Paragraph (b) is unnecessary since a violation of an emission limit resulting from failure to implement such a plan would be an enforceable violation of the permit in any event. Paragraph (b) would essentially convert such a violation into two separate violations of the permit, resulting in a double penalty. Capitol requests that Paragraph (b) be deleted or that language be inserted stating: "However, where an exceedance results from the failure to implement a preventive maintenance plan, this permit condition shall not provide the basis for a separate penalty or enforcement action. Enforcement and penalties shall be limited to the underlying emission limit." If IDEM created this condition with the intention of making compliance with the preventive maintenance plan a surrogate for compliance with the underlying emission requirements, it should state this intention clearly and revise this condition to provide that the permittee may not be subject to enforcement for violation of an underlying applicable requirement with respect to an emission unit for which the facility complied with its preventive maintenance plan. Such language is the only way to prevent this condition from creating double penalties for a single permit violation. At a minimum, since Paragraph (b) is not based upon any provision of Indiana's SIP or other federally enforceable regulation, it should be made state-only enforceable.

Response 14:

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. IDEM has clarified the preventive maintenance requirements by working with sources on draft language over the past two years. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each Permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each Permittee's Annual Compliance Certification. Each Permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Title V and FESOP permit programs.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan." Under that section the Permittee's Preventive Maintenance Plan (PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. The second was inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement. The maintenance plan was to set out the "corrective actions" that the Permittee would take in the event an inspection indicated an "out of specification situation," and also set out the time frame for taking the corrective action. In addition, the PMP had to include a schedule for devising additional corrective actions for out of compliance situations that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the Permittee's equipment so that an exceedance of an emission limit or violation of other permit requirements could be prevented.

After issuing the first draft Title V permits on public notice in July of 1997, IDEM received comments

from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was that the corrective action and related schedule requirements be removed from the PMP requirement and placed into some other requirement in the permit. This suggestion was based, in some part, on the desire that a Permittee's maintenance staff handle the routine maintenance of the equipment, and a Permittee's environmental compliance and engineering staff handle the compliance monitoring and steps taken in reaction to an indication that the facility required maintenance to prevent an environmental problem.

IDEM carefully considered this suggestion and agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement, which IDEM named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps." That is how the present CRP requirements became separated from the PMP requirement, and acquired their distinctive nomenclature.

Other comments sought clarification on whether the failure to follow the PMP was a violation of the permit. The concern was that a Permittee's PMP might call for the Permittee to have, for example, three "widget" replacement parts in inventory. If one widgets was taken from inventory for use in maintenance, then the Permittee might be in violation of the PMP, since there were no longer three widgets in inventory, as required by the PMP. Comments also expressed a view that if a maintenance employee was unexpectedly delayed in making the inspection under the PMP's schedule, for example by the employee's sudden illness, another permit violation could occur, even though the equipment was still functioning properly.

IDEM considered the comments and revised the PMP requirement so that if the Permittee fails to follow its PMP, a permit violation will occur only if the lack of proper maintenance causes or contributes to a violation of any limitation on emissions or potential to emit. This was also the second basis for separating the compliance maintenance response steps from the PMP and placing them in the Compliance Response Plan (CRP). Unlike the PMP, the Permittee must conduct the required monitoring and take any response steps as set out in the CRP (unless otherwise excused) or a permit violation will occur.

The Compliance Monitoring Plan is made up of the PMP, the CRP, the compliance monitoring and compliance determination requirements in section D of the permit, and the record keeping and reporting requirements in sections C and D. IDEM decided to list all these requirements under this new name, the Compliance Monitoring Plan (CMP), to distinguish them from the PMP requirements. The section D provisions set out which facilities must comply with the CMP requirement. The authority for the CMP provisions is found at 326 IAC 2-7-5(1), 2-7-5(3), 2-7-5(13). 2-7-6(1), 1-6-3 and 1-6-5.

Most Permittees already have a plan for conducting preventive maintenance for the emission units and control devices. It is simply a good business practice to have identified the specific personnel whose job duties include inspecting, maintaining and repairing the emission control devices. The emission unit equipment and the emission control equipment may be covered by a written recommendation from the manufacturer for the regular inspection and maintenance of the equipment. The Permittee will usually have adopted an inspection and maintenance schedule that works for its particular equipment and process in order to keep equipment downtime to a minimum and achieve environmental compliance. The manufacturer may also have indicated, or the Permittee may know from experience, what replacement parts should be kept on hand. The Permittee may already keep sufficient spare parts on hand so that if a replacement is needed, it can be quickly installed, without a delay in the Permittee's business activities and without an

environmental violation. For the most part, the PMP can be created by combining present business practices and equipment manufacturer guidance into one document, the Preventive Maintenance Plan (PMP).

The Permittee has 90 days to prepare, maintain and implement the PMP. IDEM is not going to draft the PMP. Permittees know their processes and equipment extremely well and are in the best position to draft the PMP. IDEM's air inspectors and permit staff will be available to assist the Permittee with any questions about the PMP. IDEM may request a copy of the PMP to review and approve.

The Preventive Maintenance Plan requirement must be included in every applicable Title V permit pursuant to 326 IAC 2-7-5(13) and for each FESOP permit pursuant to 326 IAC 2-8-4(9). Both of those rules refer back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

(a) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),

(b) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and

(c) The identification and quantification of the replacement parts for the facility which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. The commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment under 326 IAC 1-6-5.

The CRP requirement of response steps and schedule requirements are another example of documenting procedures most Permittees already have developed in the course of good business practices and the prevention of environmental problems. Equipment will often arrive with the manufacturer's trouble shooting guide. It will specify the steps to take when the equipment is not functioning correctly. The steps may involve some initial checking of the system to locate the exact cause, and other steps to place the system back into proper working order. Using the trouble shooting guide and the Permittee's own experience with the equipment, the steps are taken in order and as scheduled until the problem is fixed.

A Permittee will likely already have a procedure to follow when an unforeseen problem situation occurs. The procedure may list the staff to contact in order to select a course of action, or other step, before the equipment problem creates an environmental violation or interrupts the Permittee's business process.

The Compliance Monitoring Plan (CMP) is consistent with IDEM's Compliance Monitoring Guidance released in May of 1996. The guidance discusses corrective action plans setting out the steps to take when compliance monitoring shows an out of range reading (Guidance, page 13). Some of the terminology has changed, as a result of comments from regulated sources, but the requirements in the permit do not conflict with the guidance.

Pursuant to 326 IAC 2-7-5(1)(E), "The permit shall provide that, in the event of any exceedance of a permit limitation or condition which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, such multiple exceedances shall constitute a single potential violation of the permit." A violation of an emission limitation occurring as a result of not abiding by the source's Preventive Maintenance Plan shall constitute a single violation. There are no changes to the permit as a result of this comment.

Comment 15:

Condition B.14
Capitol requests clarification of the first sentence of Paragraph (b) of this condition. Capitol assumes that the purpose of this sentence is to clarify that the language of this permit is intended to take precedence over the language in any regulations or applicable requirements. However, Capitol is concerned that reference to the permit as the "primary document" for determining compliance could arguably be interpreted to in some way diminish the protection afforded by the permit shield. Capitol requests that this sentence be replaced with a sentence stating: "The language of this permit is intended to be the controlling authority and will control in situations in which it appears that any regulations are in conflict with the permit" or that it be deleted.

The first sentence of Paragraph (c) contains language that does not appear in the regulation on which the language is based. It appears that the addition of this language is intended to clarify the underlying regulation. Capitol agrees with the addition of much of this language, but is concerned that the language "including any term or condition from a previously issued construction or operation permit" could arguably be interpreted to require reopening of a permit because it is inconsistent with a preexisting permit condition even though that condition was obsolete or even illegal or incorrect in the first place. This interpretation would nullify the ability to "clean up" permits using Title V, one of the more important benefits of the program. As an example in Capitol's case, IDEM has excluded Operating Condition 9 of CP 111-2823-00005 from the draft Title V permit because that condition lacked regulatory basis in the first place. See Technical Support Document at 5. To address this concern, Capitol requests that IDEM place the following language at the end of the Paragraph (c): "Nonconformance with a previously-issued construction or operation permit shall not create a requirement to reopen or revise this permit if the conditions with which this permit is inconsistent were obsolete, illegal, redundant, or otherwise improper or unnecessary."

Response 15:

This condition is almost exactly the wording required by 326 IAC 2-7-15. The first sentence of Condition B.14(b) does not diminish the protection afforded by the permit shield.

On July 28, 1998, the OAM was notified that the U.S. EPA would object to any Title V Operating Permit that superceded all previous construction permits. The U.S. EPA indicated that they believed that the authority for certain applicable requirements might expire if the construction permits that established them expired. The OAM believes that the regulatory process is best served if all affected parties are able to rely on the Title V Operating Permit to identify all applicable requirements and the means for demonstrating compliance with each requirement. The OAM intends to continue discussions with the U.S. EPA regarding the issues related to past construction permits. However the OAM also believes that the Permit Shield condition B.14 (b) (1) & (2) establishes that the Title V permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of the permit shall be deemed in compliance with any applicable requirements

as of the date of the permit issuance for all the previous permits identified by the source and the OAM during the course of this review.

According to Condition B.14(c) the permit will be reopened and revised if the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit. To address this issue, all requirements of previously issued permits that are now determined to be not applicable are included in Section D of the permit. Condition D.4.2 has been revised as follows:

D.4.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the buffing facilities, six (6) extrusion sawing stations, one (1) debridging sawing operation, one (1) extrusion chop saw, drilling and machining operations, one (1) woodworking saw, paint pretreatment system, one (1) deburring machine, and the following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment, shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour.

(b) The requirement from CP 111-2823-00005, issued on November 5, 1993, Operation Condition 9, that established a 7.58 pounds per hour particulate matter emission limitation from the fuel combustion units other than the anodizing boiler and stated that particulate matter emissions will be considered in compliance with 326 IAC 6-3-2 provided that visible emissions do not exceed 20% opacity, is not applicable because particulate emissions from the fuel combustion units result solely from combustion and not from a production process. Fuel use is not counted towards process weight rate. Therefore, the requirements of 326 IAC 6-3-2 are not applicable to the fuel combustion units.

Condition D.1.2 is also revised as follows:

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

(a) Pursuant to CP 111-2823-00005, issued on November 5, 1993, the VOC usage at the two (2) electrostatic paint spray booths shall be limited to 246 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive months. This usage limit is required to limit the potential to emit of VOC to less than 246 tons per twelve (12) consecutive months. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

(b) Operation Condition 5 of CP 111-2823-00005, issued on November 5, 1993, which states that there is a monthly VOC limit is replaced by (a) of this condition which contains an annual limit based on a twelve (12) consecutive month total.

Comment 16:

Condition B.16.

The method for submitting deviation reports in Paragraph (a) of this section should be clarified. Capitol requests use of language similar to that used to define a "timely" renewal application in Condition B.18, Paragraph (b)(1) and used elsewhere in this permit.

Response 16:

The final sentence of Condition B.16(a) specifies that deviations must be reported within ten (10) calendar days from the date of discovery. Deviations must be postmarked within ten (10) calendar days from the date of discovery.

Comment 17:

Condition B. 21.
With the exception of paragraph (b), this condition is redundant in light of Paragraph (b) of Condition B.22. To improve clarity by consolidating related permit requirements, Capitol requests that this condition be deleted and that the language that currently appears in Paragraph (b) of Condition B.21 regarding the permit shield be added to the end of Paragraph (b) of Condition B.22.

Response 17:

Conditions B.21 and B.22 have been revised as requested.

~~B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]~~

~~The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:~~

~~(a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.~~

~~(b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).~~

~~B.22~~**B.21** Operational Flexibility [326 IAC 2-7-20]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-1**.1** has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; ~~and~~

(4) Any permit term or condition that is no longer applicable as a result of the change**; and**

(5) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

Comment 18:

Condition B. 22.
Paragraph (a)(2) seeks to make obtaining all necessary construction and operating permits a prerequisite to exempting certain changes from Title V permit revision requirements. This requirement is not based on any regulation. Indiana's Operational Flexibility rule at 326 IAC 2-7-20 enumerates the specific prerequisites for making a change without a Title V permit revision. It includes all of the items listed in Paragraph (a) except (a)(2). Paragraph (a)(2) is therefore without legal basis. It is also unnecessary to assure compliance and enforceability for preconstruction permitting requirements since Condition B.23 already provides that assurance.

This condition would also convert a violation of the preconstruction permit requirement into a violation of the requirement to revise a Title V permit by taking away the "operational flexibility" exemption. This provision would thus lead to "double counting" of penalties by converting a single violation of preconstruction permitting rules – which can include very minor changes that are not permitted through inadvertence -- into a violation of Conditions B.22 and B.23. Capitol requests that Paragraph (a)(2) be deleted. As indicated above, Capitol also requests that certain language from Condition B.21 be consolidated with Condition B.22.

Response 18:

326 IAC 2-7-20(a)(2) specifies that any change that does not result in emissions which exceed the emissions allowable under the permit does not need prior permit revision provided that the other requirements of 326 IAC 2-7-20 are satisfied. Condition B.22(a)(2) (now Condition B.21(a)(2)) indicates that approvals required by 326 IAC 2-1.1 must be obtained. Approvals are only required by 326 IAC 2-1.1 for new sources or facilities or modifications to existing sources when the potential to emit any regulated pollutant is equal to or exceed amounts specified by 326 IAC 2. Therefore, approvals are required only when there is an increase in the allowable emissions and the requirement of Condition B.22(a)(2) (now Condition B.21(a)(2)) is consistent with 326 IAC 2-7-20 and 326 IAC 2-1.1. Condition B.23 (now Condition B.22) requires that any modifications, construction, or reconstruction shall be approved in accordance with 326 IAC 2. The intent of Condition B.22(a) (now B.21(a)) is to specify when prior permit revisions are not required. Condition B.23 (now B.22) ensures that all approvals must be in accordance with 326 IAC 2. This includes 326 IAC 2-7, Part 70 Permit Program, and 326 IAC 2-8, FESOP. There are no changes to the permit resulting from this comment.

Comment 19:

Condition B.24.
The regulation upon which Paragraph (d) of this condition is based limits IDEM and EPA's sampling and monitoring to those activities "authorized by the [Clean Air Act]." 326 IAC 2-7-6(2)(D). By omitting this language, Paragraph (d) could arguably be read to expand that authority by removing that limitation in a manner inconsistent with the regulations. Capitol requests that the language: "As authorized by the Clean Air Act" be inserted at the beginning of Paragraph (d).

Paragraph (e) appears intended to assure that business confidential materials will be protected from

disclosure. However, the introductory language, especially the language "assuring compliance," is ambiguous and does not appear consistent with the apparent purpose of Paragraph (e). Capitol is concerned that this language could be interpreted to create authority to require activities and/or to use certain information as evidence in enforcement proceedings in a manner that is not authorized by law. Capitol requests that the introductory language be revised to read: "Any information, records, or documents obtained by or for EPA and/or IDEM through inspections, recording, testing, monitoring, or use of other equipment for the purpose of assuring compliance is subject to the following limitations."

Response 19:

Condition B.24(d) (now Condition B.23(d)) has been revised as follows:

(d) **As authorized by the Clean Air Act and IC 13-14-2-2** Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

The wording requested has not been added to paragraph (e) of this condition. The Permittee has the right to claim that certain information is confidential and such information shall be treated as such as long as this treatment of confidentiality does not violate any applicable rules and laws.

Comment 20:

Condition B.27.
This condition lacks legal basis. No regulations containing "credible evidence" (CE) provisions currently apply to Capitol's facility. Capitol is not subject to federal New Source Performance Standards or National Emission Standards for Hazardous Air Pollutants, so the CE revisions made to those regulations do not apply. Although EPA has added certain language regarding "credible evidence" issues to the requirements applicable to State Implementation Plans (SIPs) in 40 CFR Part 51, Indiana has not yet incorporated any such language in its SIP. This condition would be inconsistent with several provisions of Indiana's SIP that designate specific methods to be used to determine compliance. See. e.g., 326 IAC 1-2-90(b), (d) (requiring that compliance with VOC limits be "measured by the test methods in this title or 40 CFR 60, Appendix A, as applicable" and that U.S. EPA in federal enforcement actions "shall use the test methods specified in Indiana's approved state implementation plan" or a relevant permit or regulation); 326 IAC 8-1-3 (providing specific methods for determining compliance with VOC rules and stating in subsection (d) that "[a]ny equivalent method which is allowed to be used to determine or achieve compliance . . . shall be submitted to the U.S. EPA as a SIP revision"). Thus, including a CE provision in this permit would essentially amend the Indiana SIP regulations through a permitting process rather than through rulemaking as required by Indiana law.

This concern is especially troubling in light of the questionable legality of EPA's CE rulemaking. An appeal of those regulations is pending in the United States Court of Appeals for the District of Columbia Circuit. Although the appeal was initially dismissed, further appeals of that ruling have been filed, leaving open the possibility that that court would hold it invalid in the future. More important, the dismissal was based on a ruling that the appeal was not ripe as a matter of administrative law and left the question of the legality of this rule for future adjudication. It is inappropriate to short-circuit these adjudications by codifying the CE rule in a Title V permit at this time.

Furthermore, the language of B.27 is inconsistent with EPA's CE revisions in ways that would

broaden the scope of permissible evidence in contravention of limitations specifically incorporated into the rules by EPA. EPA's CE regulations provide that SIPs may not "preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test procedures or methods had been performed." 40 C.F.R. § 51.212(c) (emphasis added). EPA specifically included this language to allow the use of only data that has sufficient technical reliability, averaging time, and similarity to data generated by reference test methods in enforcement actions. Condition B.27 does not contain this limitation and thus could arguably be interpreted as allowing the use of evidence that has no such assurance of reliability or similarity to reference test method data. Furthermore, the permit language goes beyond clarifying that the permit does not "preclude the use" of evidence that satisfies the limitations of the EPA's CE regulation because it states that "other credible evidence may be used to demonstrate compliance or noncompliance." Since this language could arguably be read to authorize use of evidence that EPA's CE provisions would not, the language would lack legal justification even if Indiana's SIP had been revised to follow EPA's CE revisions.

Finally, including CE language in a Title V permit is unnecessary. The CE rule is essentially an evidentiary provision for use in enforcement proceedings. Title V permits do not (and are not required to) contain evidentiary provisions governing enforcement proceedings. If a CE provision is ultimately codified as part of the Indiana SIP, it will apply irrespective of whether it appears in the permit.

IDEM may have included this language to address concerns about a provision of the permit being interpreted to render inadmissible evidence that could otherwise be used in an enforcement proceeding or being inconsistent with CE language that is later added to the Indiana SIP. If so, IDEM can satisfy this concern by replacing Condition B.27 with language stating: "The language of this permit shall not be interpreted as narrowing or prohibiting the use of any evidence in enforcement proceedings in a manner inconsistent with applicable law." This language would ensure that the permit does not illegally adopt a CE provision at this time while retaining the flexibility necessary to avoid inconsistency with any language subsequently adopted. Capitol requests that Condition B.27 be deleted or replaced with this language.

Since this condition is not based upon any provision of Indiana's SIP or other federally enforceable regulation, it should made applicable to state enforcement actions only if it is not deleted.

Response 20:

The IDEM now believes that Condition B.27, Credible Evidence, is not necessary and has removed it from the permit. The issues regarding credible evidence can be adequately addressed during a showing of compliance or noncompliance. Indiana's statues, and the rules adopted under their authority, govern the admissibility of evidence in any proceeding. Indiana law contains no provisions that limit the use of any credible evidence and an explicit statement is not required in the permit. Therefore, Condition B.27 has been removed from the permit.

~~B.27 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]~~

~~Not withstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.~~

Section C.

Comment 21:

Condition C.2.
For purposes of clarity and consistency with the underlying regulations, Capitol requests that the language "not including water vapor" be inserted after the words "visible emissions" in the second line of this condition.

Response 21:

As indicated in 326 IAC 5-1-1, the requirements of 326 IAC 5-1, Opacity Limitations, apply to visible emissions, not including condensed water vapor. Also, Condition C.2 has been revised to reflect the current rule language in 326 IAC 5-1-2 as follows:

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (~~Visible Emissions~~ **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~visible emissions~~ opacity**, excluding water vapor,** shall meet the following, unless otherwise stated in this permit:

(a) ~~Visible emissions~~ **Opacity** shall not exceed an average of forty percent (40%) ~~opacity~~ in ~~twenty-four (24) consecutive readings~~, **any one (1) six (6) minute averaging period** as determined in 326 IAC 5-1-4.

(b) ~~Visible emissions~~ **Opacity** shall not exceed sixty percent (60%) ~~opacity~~ for more than a cumulative total of fifteen (15) minutes (sixty (60) readings **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor)** in a six (6) hour period.

Comment 22:

Conditions C.3 and C.4.
These conditions are based on a regulatory requirement that do not apply to the Capitol facility since Capitol does not operate an incinerator, engage in open burning of materials, or otherwise incinerate any waste or refuse. Capitol requests that these conditions be deleted.

Response 22:

Although these operations may not be part of normal operation, these conditions regulate possible open burning, etc., that can take place at any source and, thus are included in all permits. For example, Condition C.3 states, "The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2." The condition is a general prohibition against improper incineration that applies to all sources, whether the source has incinerators or not. Waste material can only be burned in equipment that meets the cited requirements. Pursuant to 326 IAC 2-7-5, the permit must include all applicable requirements. Therefore, Conditions C.3 and C.4 are not changed as requested. Condition C.4 is revised as follows:

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. **The provisions of 326 IAC 9-1-2 are not federally**

enforceable.

Comment 23:

Condition C.6.

This condition is without legal basis and is based on inaccurate factual assumptions. It would appear to render any period of time in which emission units are operated without use of a listed control device a violation of the permit. It is thus based upon an assumption that all emission units that use control equipment will be in violation of those limits whenever the equipment is bypassed or inoperative. This assumption is incorrect. Emission units that operate in different modes can have emissions below a mass limit even without their associated control devices in operation. This condition ignores these issues by rendering periods in which the control device is not operative an automatic violation of the permit.

Furthermore, the condition fails to take averaging times of emission limits into consideration. A short-term period in which emissions exceed rates set forth in mass emission limits because associated control equipment is not in operation will not necessarily result in a violation of the limit when considered over the appropriate averaging period. This condition could be argued to convert such short term exceedances into violations of the permit since it provides that any period in which the control device is not in operation is a violation of the permit, irrespective of the duration of that period or the effect upon emissions. This is especially problematic when considered in connection with the deviation reporting requirements of this permit. It is unclear how the permittee is required to determine whether a deviation has occurred. It would be inappropriate to require reporting of any period of control device inoperation as a deviation, no matter how brief that period may be.

The Title V rules do not provide authority to create or to impose new regulatory restrictions. The draft cites IDEM's authority to include "Such other provisions as the commissioner may require" in 326 IAC 2-7-6(6) as the basis for this language. This language is taken from the Title V regulations regarding IDEM's authority to require monitoring, inspection, and compliance certification provisions in Title V permits. The generic authority to include "other provisions" under this rule must be read in light of the rule from which it was taken. It is an impermissible stretch of that rule to use it to create a general authority to place new operational restrictions in Title V permits. Capitol requests that this condition be deleted.

If this condition is retained, Capitol requests that, at a minimum, the language of Condition C.6 apply only to the control equipment that is necessary to maintain compliance with the conditions of Section D. In addition, the permit should clarify that a defense under the "emergency" provisions outlined in Condition B.13 should apply to alleged violations of this condition as long as the permittee complies with the requirements stated in that Condition. IDEM should also exempt noncompliance of this condition from reporting as deviations or clarify how the permittee is to determine when a deviation has occurred. A brief period in which control equipment is out of operation should not constitute a deviation. Finally, since this condition is not based upon any provision of Indiana's SIP or other federally enforceable regulation, it should be made state-only enforceable if it is not deleted.

Response 23:

Condition C.6 states that "All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation." The phrase "used to comply with an applicable requirement" satisfies the wording requested. See responses 1 and 7.

Comment 24:

Condition C.9.
Retests are sometimes necessary if problems are encountered with performance tests or if a source wishes to verify the results of a test. While it often makes sense to retest as soon as practicable after a test, advance notification requirements can pose a problem in this situation. To address this issue, Capitol requests that the following language be added to the end of Paragraph (a): "If the permittee decides to conduct a retest due to problems with a performance test or a need to verify test results, the two week notice requirement does not apply to the retest provided that the permittee provides verbal notification of its intent to retest as soon as the decision to retest is made and postmarks, telecopies, or ships a written confirmation within the next business day."

Response 24:

If problems occur during a performance test that nullifies the credibility of the test, the "retest" is considered part of the same test. Therefore, the original test protocol is sufficient, but the source must provide IDEM with a two (2) week advanced notice of the date of the retest. A two (2) week advanced notice is also required for retests due to noncompliance discovered during a performance test. This situation is addressed in Condition C.16.

Comment 25:

Condition C.14.
Capitol requests clarification of Paragraph (a) of this condition. The underlying regulation (326 IAC 2-7-5(12)) appears to mandate that permits require either a compliance schedule or annual compliance certification for Part 68 requirements. It is likely that this permit will be finalized before the June 21, 1999 applicability date for 40 C.F.R. Part 68, and the first annual compliance certification for this permit will not be required until after that date. Since the applicability date is fast approaching and since Capitol intends to be in complete compliance with Part 68 by that date, it would appear that submittal of a "compliance schedule" under Paragraph (a)(1) is unnecessary. Accordingly, Capitol requests that Paragraph (a)(1) of this condition be deleted and that the permit contain only the certification requirements of Paragraph (a)(2).

If IDEM leaves Paragraph (a)(1) in place, the permit should provide clarification regarding what, if anything, must be submitted under the permit before the June 21 applicability date and when any submittal will be required. Capitol would also like to obtain clarification of what "verification" is required under Paragraph (a)(3) of this condition, when it is required, and to whom it must be sent.

Finally, Paragraph (b) of this condition is redundant because certification of compliance with Part 68 requirements is already required as part of the annual compliance certification as set forth in Paragraph (a)(2). If certification that a Risk Management Plan "is being properly implemented" is intended to mean something different from a compliance certification, there is no support for such a condition in the Title V regulations, which provide for compliance certification only. Capitol requests that Paragraph (b) be deleted. If IDEM elects to retain this Paragraph, it should clarify what "being properly implemented" means and should indicate the regulatory basis for such a requirement. Furthermore, since Paragraph (b) is not based upon any provision of Indiana's SIP or other federally enforceable regulation, it should be made state-only enforceable if it is not deleted.

Response 25:

Condition C.14 requires that either (a)(1) or (a)(2) are fulfilled. Conditions C.14(a)(3) and C.14(b)

must be fulfilled in addition to the requirements of Conditions C.14(a)(1) or C.14(a)(2). Therefore, Condition C.14(a)(1) will remain in the permit.

As indicated by 326 IAC 2-7-6(5)(D), all compliance certifications shall be submitted to the US EPA as well as to the IDEM, OAM. The verification in Condition C.14(a)(3), in the form of a letter from the Permittee, must be sent to IDEM, OAM at the address listed in Condition B.11(a), Annual Compliance Certification. All required submittals must be obtained prior to the applicability date of 40 CFR 68. The permit would become too extensive if detailed information about the verification and certification is included. IDEM is willing to work with each source on the details of these submittals.

While Condition C.14(a) is a way to determine initial compliance with 40 CFR 68, Condition C.14(b) is a requirement that allows the source and IDEM to determine compliance 40 CFR 68 on an annual basis in the future.

Comment 26:

Condition C.15.
This condition appears to impose new requirements without any legal basis. There is no provision in any applicable federal or state rule providing authority to require Title V permittees to implement "compliance monitoring plans" or "compliance response plans." The only new requirements that Title V permits may contain are new monitoring requirements pursuant to the periodic monitoring provisions in 326 IAC 2-7-5(3)(A)(ii) and related record keeping and reporting requirements. That provision does not authorize requiring permittees to develop written procedures for requiring implementation of specified "response steps" within specified time frames based on monitoring measurements. Certainly, U.S. EPA's September 18, 1998 guidance regarding the scope of the "periodic monitoring" requirements provide no source for such an interpretation.

Condition (b) would make failure to implement such steps a violation of the permit condition, effectively rendering the "compliance response plan" a new set of enforceable operating requirements that exist in addition to the emission limits on which they are purportedly based. The result is the potential for enforceable violations may be alleged even in situations where there may have been no actual violation of underlying emission standards. Where an exceedance exists, this provision could be argued to convert what was previously a single enforceable violation (exceedance of the underlying emission limit) into two violations.

It appears that these provisions are loosely based on language that was proposed by U.S. EPA at one time as part of its Compliance Assurance Monitoring (CAM) rule. However, this condition goes beyond the requirements of the final CAM rule as promulgated. The CAM rule does not require sources to develop specific written response procedures. The CAM rule requires sources that detect excursions or exceedances to restore "normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions." 40 C.F.R. §64.7(d)(1). Thus, not even the CAM rule would authorize permit requirements of this nature. Of course, even the CAM rule will not apply to the Capitol facility until its Title V permit is renewed or undergoes a significant revision. See 40 C.F.R. §64.5(a).

Because this condition seeks to create illegal permit requirements that could create enforceable violations even where there is no exceedance of an emission limit, Capitol requests that Condition C.15 be deleted. Since this condition is not based upon any provision of Indiana's SIP or other federally enforceable regulation, it should made be state-only enforceable if it is not deleted.

Response 26:

See response 14.

Comment 27:

Condition C.16.

As with Condition C.15, this Condition seeks to create new requirements that have no legal basis whatsoever. If a stack test indicates an enforceable violation, then enforcement for that violation may occur. Permittees have the incentive to resolve the cause of a violation and to retest promptly, since continuing enforcement exposure can exist if the problem is not resolved. This condition seeks to superimpose a second requirement to take "appropriate corrective actions" and to take "appropriate action to minimize emissions . . . while the corrective actions are being implemented." It creates the possibility for a second enforceable violation if IDEM concludes that the action taken is not "appropriate." Since there is no regulatory basis for this provision, Capitol requests that it be deleted. If it is IDEM's intent to provide that the actions required by this condition are to serve as a surrogate for complying with the underlying requirement after a stack test indicates violation of an emission limit, it should say so explicitly and amend the condition to state that: "The permittee will not be subject to enforcement for violation of the emission limit for any days between the first performance test and the retest if the permittee took both appropriate corrective actions and appropriate action to minimize emissions while the corrective actions were being implemented in accordance with this paragraph." Such language is the only way to prevent this condition from creating double penalties for a single permit violation.

Response 27:

Pursuant to 326 IAC 2-7-5(1)(E), "The permit shall provide that, in the event of any exceedance of a permit limitation or condition which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, such multiple exceedances shall constitute a single potential violation of the permit." Therefore, the rule cite "326 IAC 2-7-5" satisfies the wording requested. The initial violation and any corrective actions deemed inappropriate would constitute a single violation of the permit. There are no changes to the permit as a result of this comment.

Comment 28:

Condition C.18.

Paragraph (a) of this condition is inconsistent with applicable requirements that provide for permissible periods of monitor downtime. For example, New Source Performance Standard regulations permit continuous emission monitoring systems to be inoperative during periods of "system breakdowns, repairs, calibration checks, and zero and span adjustments." 40 C.F.R. § 60.13(e). To avoid conflict with these and other applicable requirements of this nature, the language "except during periods of system breakdown, repairs, calibration checks or adjustments, or any other periods in which applicable requirements authorize monitoring to be inoperative" should be added to the end of this paragraph.

Response 28:

Condition C.18(a) is written as follows:

(a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

The statement "the equipment is operating at normal representative conditions" satisfies the wording requested. System breakdown, repairs, calibration checks or adjustments, or any other periods in which applicable requirements authorize monitoring to be inoperative are not normal representative conditions. There is no change to the permit as a result of this comment.

Comment 29:

Condition C.20.
Consistent with 326 IAC 2-7-5(3)(C)(i), Paragraph (a) of this condition should require that monitoring reports be made every six months rather than quarterly.

Response 29:

Pursuant to 326 IAC 2-7-5(3)(C)(i), reports shall of reports of any required monitoring must be at least every six (6) months. It is IDEM's policy to request that the Compliance Monitoring Report be submitted quarterly when there are other quarterly reports required for that source.

Section D.

Comment 30:

General Comment for Section D.
Each part of Section D of the draft permit contains "Facility Descriptions" that specify which emission units are covered by that portion of the section. Each such description follows the descriptive language in Section A. However the Section D descriptions do not contain the language provided in the beginning of Section A that clarifies that the descriptions are not intended to be enforceable permit conditions. Since IDEM clearly does not intend these descriptions to be interpreted as permit conditions, Capitol requests that the following language be placed at the beginning of every "Facility Description":

> The information describing the source contained in this Facility Description is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

This language is consistent with IDEM's approach and intent regarding the descriptive language in Section A (as modified consistent with Capitol's comments regarding Section A).

Response 30:

The descriptions that are listed in the box that prefaces each D Section is information that was obtained from the applicant and was used to establish the actual permit conditions that follow. These descriptions are treated the same as those in the A Section and not considered to be directly

enforceable. The descriptions of the equipment would only be considered enforceable if explicitly stated in a permit condition. The descriptions should be considered very carefully because, just like the A Section descriptions, changes can affect compliance with existing applicable requirements or trigger new applicable requirements. New requirements may include the need to obtain a revision to this permit prior to affecting the change. Facility descriptions are not federally enforceable, and a Facility Description Box is not a permit condition and thus is also not federally enforceable. It is clearly stated in Section A of every permit that these facility descriptions are not federally enforceable. In order to avoid confusion on this issue, additional language will be added into every Facility Description Box contained in Section D to further clarify that facility descriptions are not federally enforceable. This change will be incorporated into the model permit as part of the next model permit revision, and individual permits will be revised upon request by the Permittee. The following language is added to each Facility Description Box:

The information describing the processes contained in this facility description box is descriptive information and does not constitute enforceable conditions.

Comment 31:

Emergency/Deviation Occurrence Report
Capitol is concerned that some of the language in this form regarding the time at which reports must be made will be inconsistent with the actual reporting requirements under the permit in some situations. Capitol requests that language be placed in either the permit or the form clarifying that these reporting times apply in only certain situations. Language on the form stating: "Consult the permit to determine actual reporting deadlines" would address this issue adequately.

Response 31:

The frequencies of reporting in this form agree with the frequencies specified in Conditions B.13, Emergency Provisions, and B.16, Deviations from Permit Requirements and Conditions. Therefore, there are no changes to the permit as a result of this comment.

Additional Changes:

On April 20, 1999, Steve Portteus, submitted additional requests for changes. As a result of the request, IDEM has agreed to make the following change to Condition B.23 (now B.22) of the permit:

B.22 Construction Permit Requirement [326 IAC 2]

~~Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997~~, **A** modification, construction, or reconstruction shall be approved ~~as~~ **if** required by and in accordance with **the applicable provisions of** 326 IAC 2. **The Permittee had previously been issued two (2) permits: Operating Permit 56-07-91-0049 and Construction Permit 111-2823-00005.**

On July 28, 1999, Steve Portteus, submitted additional comments. The following Insignificant Activities have been changed:

Aging Oven J is updated. There are no changes to the permit as a result of this change.

(4) One (1) aging oven, known as EXTR-2, aging oven J, fueled by natural gas and propane as a back up fuel, installed in **1998** ~~1978~~ exhausted to S-5, heat input capacity: **4.0** ~~1.8~~ million British thermal units per hour.

The insignificant buffing facilities have been removed. Section A.3(c), the facility description in section D.4 is revised as follows:

(c) Other activities or categories with emissions below insignificant thresholds:

~~(1) Buffing facilities, capacity: 1.75 tons per hour.~~

~~(2)~~**(1)** Six (6) extrusion sawing stations, capacity: 5.0 tons per hour, each.

~~(3)~~**(2)** One (1) debridging sawing operation, capacity: 3.5 tons per hour.

~~(4)~~**(3)** One (1) extrusion chop saw, capacity: 5.0 tons per hour.

~~(5)~~**(4)** Drilling and machining operations, capacity: 2.5 tons per hour, total.

~~(6)~~**(5)** One (1) woodworking saw, 0.25 tons per hour.

~~(7)~~**(6)** Paint pretreatment system.

~~(8)~~**(7)** One (1) deburring machine, installed in 1997, capacity: 0.25 tons per hour.

As a result of this change, Condition D.4.2 is revised as follows:

D.4.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the ~~buffing facilities,~~ six (6) extrusion sawing stations, one (1) debridging sawing operation, one (1) extrusion chop saw, drilling and machining operations, one (1) woodworking saw, paint pretreatment system, one (1) deburring machine, and the following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment, shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour.

(b) The requirement from CP 111-2823-00005, issued on November 5, 1993, Operation Condition 9, that established a 7.58 pounds per hour particulate matter emission limitation from the fuel combustion units other than the anodizing boiler and stated that particulate matter emissions will be considered in compliance with 326 IAC 6-3-2 provided that visible emissions do not exceed 20% opacity, is not applicable because particulate emissions from the fuel combustion units result solely from combustion and not from a production process. Fuel use is not counted towards process weight rate. Therefore, the requirements of 326 IAC 6-3-2 are not applicable to the fuel combustion units.

Indiana Department of Environmental Management
Office of Air Management

ATTACHMENT 1 OF T111-5887-00005
DETERMINATION OF INAPPLICABILITY

Source Name: **Capitol Products Corporation**
Source Location: **508 W. Wilson Street, Kentland, Indiana 47951**
County: **Newton**
SIC Code: **3354, 3471**
Operation Permit No.: **T 111-5887-00005**
Permit Reviewer: **CarrieAnn Ortolani**

The following regulatory requirements have been determined inapplicable to the Capitol Products Corp. plant in Kentland, Indiana (the source), based on the information submitted by Capitol Products Corp. in the permit application, as of the date of issuance of this Title V Operating Permit, T111-5887-00005 (the permit), for the following emission units:

SIGNIFICANT EMISSION UNITS

(a) One (1) electrostatic paint spray booth 1, known as paint 1, booth 1, installed in 1984, equipped with electrostatic disc spray guns and dry filters for overspray control, exhausted to S-13, capacity: 15,120 pieces of aluminum per hour.

(b) One (1) electrostatic paint spray booth 2, known as paint 1, booth 2, installed in 1984, equipped with electrostatic disc spray guns and dry filters for overspray control, exhausted to S-14, capacity: 15,120 pieces of aluminum per hour.

(c) One (1) anodizing line, known as ANOD-1, installed in 1984, exhausted to S-15 controlled by a voluntary scrubber, S-16 and into the building, consisting of the following twenty-seven (27) tanks containing various liquids, maximum capacity: 30,000 pounds of aluminum parts per hour:

(1) One (1) Brite dip tank and one (1) Brite dip rinse tank equipped with a voluntary scrubber.

(2) Two (2) anodize tanks containing sulfuric acid and water, equipped with a voluntary scrubber.

(3) One (1) color tank containing sulfuric acid or a stannous sulfate solution and water.

(4) One (1) gold dye tank containing ferric sodium oxalate and water.

(5) Two (2) seal tanks each containing nickel and water or hydrogen fluoride and water.

(6) One (1) alkaline cleaner tank.

(7) One (1) etch tank containing NaOH and water, equipped with a voluntary scrubber.

(8) One (1) desmut tank containing nitric acid, phosphoric acid, sulfuric acid and

water.

(9) Sixteen (16) rinse tanks, using only water and obtaining materials from upstream processing tanks as part of the rinsing operation.

(d) One (1) anodizing boiler, known as ANOD-2, fueled by natural gas and propane as a back up fuel, installed in 1984, exhausted to S-12, heat input capacity: 8.4 million British thermal units per hour.

(e) One (1) billet heater, known as EXTR-1, heater H, fueled by natural gas and propane as a back up fuel, installed in 1991, exhausted to stack S-3, heat input capacity: 8.0 million British thermal units per hour.

(f) One (1) paint bake oven, known as paint 3, paint bake oven P, fueled by natural gas and propane as a back up fuel, installed in 1984, exhausted to S-11, heat input capacity: 9.0 million British thermal units per hour.

INSIGNIFICANT ACTIVITIES

(a) The following natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, and propane for liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) British thermal units per hour.

(1) One (1) billet heater, known as EXTR-1, heater F, fueled by natural gas and propane as a back-up fuel, installed in 1985, exhausted to S-1, heat input capacity: 5.3 million British thermal units per hour.

(2) One (1) billet heater, known as EXTR-1, heater G, fueled by natural gas and propane as a back-up fuel, installed in 1985, exhausted to S-2, heat input capacity: 5.5 million British thermal units per hour.

(3) One (1) aging oven, known as EXTR-2, aging oven I, fueled by natural gas and propane as a back up fuel, installed in 1972, exhausted to S-4, heat input capacity: 1.8 million British thermal units per hour.

(4) One (1) aging oven, known as EXTR-2, aging oven J, fueled by natural gas and propane as a back up fuel, installed in 1998 exhausted to S-5, heat input capacity: 4.0 million British thermal units per hour.

(5) One (1) pretreatment tank heater, known as PREPAINT 1, heater K, fueled by natural gas and propane as a back up fuel installed in 1972, exhausted to S-6, heat input capacity: 6.0 million British thermal units per hour.

(6) One (1) pretreatment tank heater, known as PREPAINT 1, heater L, fueled by natural gas and propane as a back up fuel, installed in 1984, exhausted to S-7, heat input capacity: 4.5 million British thermal units per hour.

(7) One (1) pretreatment tank heater, known as PREPAINT 1, heater M, fueled by natural gas and propane as a back up fuel, installed in 1972, exhausted to S-8,heat input capacity: 1.5 million British thermal units per hour.

(8) One (1) pretreatment tank heater, known as PREPAINT 1, heater N, fueled by natural gas and propane as a back up fuel, installed in 1984 exhausted to S-9, heat input capacity: 3.0 million British thermal units per hour.

(9) One (1) dry off oven, known as PREPAINT 2, oven O, fueled by natural gas and propane as a back up fuel, installed in 1984, exhausted to S-10, heat input capacity: 2.6 million British thermal units per hour.

(10) One (1) building heater, known as HEAT-1, heater A, fueled by natural gas and propane as a back up fuel, installed in1984, heat input capacity: 4.5 million British thermal units per hour.

(11) One (1) building heater, known as HEAT-1, heater B, fueled by natural gas and propane as a back up fuel, installed in 1980, heat input capacity: 5.3 million British thermal units per hour.

(12) One (1) building heater, known as HEAT-1, heater C, fueled by natural gas and propane as a back up fuel, installed in 1984, heat input capacity: 5.5 million British thermal units per hour.

(13) One (1) building heater, known as HEAT-1, heater D, fueled by natural gas and propane as a back up fuel, installed in 1984, heat input capacity: 5.5 million British thermal units per hour.

(14) One (1) building heater, known as HEAT-1, heater E, fueled by natural gas and propane as a back up fuel, installed in 1972, heat input capacity: 4.9 million British thermal units per hour.

(b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 British thermal units per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 British thermal units per hour.

(c) Combustion source flame safety purging on startup.

(d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

(e) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(f) The following VOC and HAP storage containers:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(2) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.

(g) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.

(h) Machining where an aqueous cutting coolant continuously floods the machining interface.

(i) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6. One (1) self-contained parts washer, installed after January 1, 1980, equipped with a remote solvent reservoir.

(j) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(k) Closed loop heating and cooling systems.

(l) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume.

(m) Any operation using aqueous solutions containing less than one percent (1%) by weight of VOCs excluding HAPs.

(n) Noncontact cooling tower systems with the following:

Forced and induced draft cooling tower system not regulated under a NESHAP.

(o) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(p) Paved and unpaved roads and parking lots with public access.

(q) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(r) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(s) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.

(t) On-site fire and emergency response training approved by the department.

(u) Emergency generators as follows:

Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.

(v) A laboratory as defined in 326 IAC 2-7-1(21)(D).

(w) Other activities or categories:

(1) Six (6) extrusion sawing stations, capacity: 5.0 tons per hour, each.

(2) One (1) debridging sawing operation, capacity: 3.5 tons per hour.

(3) One (1) extrusion chop saw, capacity: 5.0 tons per hour.

(4) Drilling and machining operations, capacity: 2.5 tons per hour, total.

(5) One (1) woodworking saw, 0.25 tons per hour.

(6) Paint pretreatment system.

(7) One (1) deburring machine, installed in 1997, capacity: 0.25 tons per hour.

(8) One (1) thermal barrier and line flush.

(9) Two (2) 30,000 gallon propane storage tanks.

The reasons for inapplicability of each rule are set forth herein:

I. STATE REGULATIONS

The determinations are based on information submitted by Capitol Products Corp. in the permit application. Any change or modification to any equipment listed in the permit may require a permit modification and may affect the following applicability determinations.

Article 2

(a) The requirements of 326 IAC 2-1-3.4 and 326 IAC 2-4.1 do not apply to the facilities at this source at the time this Part 70 permit is issued, because the owner or operator did not construct or reconstruct a major source of hazardous air pollutants (HAPs), as defined in 40 CFR 63.41, after July 27, 1997.

(b) To the extent it falls within the definition of an "applicable requirement" as that term is defined in 326 IAC 2-7-1(6), the requirements of 326 IAC 2-2, Prevention of Significant Deterioration, do not apply to this source at the time this Part 70 permit is issued, because this source is not a "major PSD source" as that term is defined by 326 IAC 2-2-1(p).

(c) To the extent it falls within the definition of an "applicable requirement" as that term is defined in 326 IAC 2-7-1(6), the requirements of 326 IAC 2-3 do not apply to this source at the time this Part 70 permit is issued, because this source is not located in an area designated as nonattainment as referenced by 326 IAC 1-4-1.

(d) Pursuant to 326 IAC 2-5.1-1(a)(2), this source is exempt from the requirements of 326 IAC 2-5.1 because the source is an existing source operating pursuant to a Part 70 permit issued under 326 IAC 2-7.

(e) Pursuant to 326 IAC 2-5.5-1(a)(2)(A), this source is exempt from the requirements of 326 IAC 2-5.5 because the source is an existing source operating pursuant to a Part 70 permit issued under 326 IAC 2-7.

(f) Pursuant to 326 IAC 2-6.1-1(2)(A), this source is exempt from the requirements of 326 IAC 2-6.1 because the source is an existing source operating pursuant to a Part 70 permit issued under 326 IAC 2-7.

(g) The requirements of 326 IAC 2-8 do not apply to this source, because the source did not apply to the commissioner for a Federally Enforceable State Operating Permit (FESOP) instead of a Part 70 permit under 326 IAC 2-7.

(h) The requirements of 326 IAC 2-11, Permit by Rule for Specific Source Categories, do not apply to this source, because the source does not include any of the following specific source categories: gasoline dispensing operations; grain elevators; or grain processing or milling.

(i) The requirements of 326 IAC 2-12 do not apply to this source because, pursuant to 326 IAC 2-12-

1(a), the rule does not apply to permits issued under 326 IAC 2-7.

Article 6:

(a) 326 IAC 6-1 is not applicable to this source because the source is not located in a county designated as a nonattainment area for particulate matter or a county listed in 326 IAC 6-1-7.

(b) 326 IAC 6-2 is only applicable to the one (1) anodizing boiler in Section D.3 of the permit, because there are no other boilers at this source.

(c) 326 IAC 6-3 only applies to the two (2) electrostatic paint spray booths in Section D.1, one (1) anodizing line in Section D.2, and the insignificant activities listed under Condition D.4.2 of the permit, because there are no other process operations at this source.

(d) 326 IAC 6-5 is not applicable to this source because the source is not considered a new source of fugitive particulate matter.

(e) 326 IAC 6-6 is not applicable because the source is not specifically named under 326 IAC 6-6-4 and 326 IAC 6-6-5.

Article 7

(a) 326 IAC 7-1.1, 326 IAC 7-2 and 326 IAC 7-3 of 326 IAC Article 7 do not apply to the source because the source does not operate any facilities or activities with a potential to emit twenty-five (25) tons per year or ten (10) pounds per hour or more of sulfur dioxide.

(b) 326 IAC 7-4 is not applicable because the source is not in a county specified by this rule.

Article 8

(a) 326 IAC 8-1-6, New facilities general reduction requirements, is not applicable to this source since all facilities with a potential to emit VOC of 25 tons per year or more are regulated by other provisions of 326 IAC 8.

(b) 326 IAC 8-2-2 does not apply because there are no automobile and light duty truck surface coating operations at the source.

(c) 326 IAC 8-2-3 does not apply because there are no can coating operations at the source.

(d) 326 IAC 8-2-4 does not apply because there are no coil coating operations at the source.

(e) 326 IAC 8-2-5 does not apply because there are no paper coating operations at the source.

(f) 326 IAC 8-2-6 does not apply because there are no metal furniture surface coating operations at the source.

(g) 326 IAC 8-2-7 does not apply because there are no large appliance coating operations at the source.

(h) 326 IAC 8-2-8 does not apply because there are no magnet wire coating operations at the source.

(i) 326 IAC 8-2-10 does not apply because the source does not manufacture or surface finish flat wood panels.

(j) 326 IAC 8-2-11 does not apply because there are no fabric and vinyl coating operations at the source.

(k) 326 IAC 8-2-12 does not apply because there are no wood furniture and cabinet coating operations at the source.

(l) With the exception of 326 IAC 8-3-2 (cold cleaner operation), the provisions of 326 IAC 8-3 do not apply to this source because the source does not have an open top vapor degreaser or a conveyorized degreaser, and the cold cleaner is equipped with a remote solvent reservoir.

(m) 326 IAC 8-4 is not applicable to this source because this source is not a petroleum source, which includes petroleum refineries, petroleum liquid storage facilities, bulk gasoline terminals, bulk gasoline plants, gasoline dispensing facilities, and gasoline transports.

(n) 326 IAC 8-5 is not applicable to his source because the source does not have the miscellaneous operations listed in Rule 8-5 (asphalt paving, pharmaceutical manufacturing, pneumatic rubber tire manufacturing, and graphic arts operations).

(o) 326 IAC 8-6 is not applicable because none of the VOC-emitting equipment at the source

commenced operation between Oct. 7, 1974 and Jan. 1, 1980 and because the VOC-emitting equipment is regulated by other provisions in Article 8.

(p) 326 IAC 8-7 is not applicable because this source does not have facilities with VOC emissions located in Lake, Porter, Clark or Floyd County.

(q) 326 IAC 8-8 is not applicable because the source is not a municipal solid waste landfill.

(r) 326 IAC 8-9 is not applicable because this source does not have stationary vessels, used to store volatile organic liquid, that are located in Clark, Floyd, Lake or Porter County.

(s) 326 IAC 8-10 is not applicable because this source does not have facilities that sell or manufacture refinishing coatings, or sell, lease, or operate a facility that refinishes motor vehicles or mobile equipment.

(t) 326 IAC 8-11 is not applicable because the source does not perform wood furniture manufacturing operations in Lake, Porter, Clark, or Floyd County.

(u) 326 IAC 8-12 is not applicable because the source does not build or repair ships.

(v) 326 IAC 8-13 is not applicable because the source does not contain a sintering processes.

(w) 326 IAC 8-2-9 applies only to the two (2) electrostatic paint spray booths with electrostatic disc spray guns and dry filters for overspray control listed in Section D.1 of the permit, because there are no other miscellaneous metal coating operations at this source.

(x) 326 IAC 8-3-2 applies only to the one (1) self-contained parts washer listed in Condition D.4.1 of the permit, because there are no other organic degreasing operations at this source.

Article 10

The requirements of 326 IAC Article 10 do not apply to the source because the source is located in Newton County, not Clark or Floyd County.

Article 11

The requirements of 326 IAC Article 11 do not apply to the source because the source does not operate any of the following: foundries; sulfuric acid plants; coke oven batteries; fiberglass insulation manufacturing activities; or primary aluminum plants.

Article 13

The requirements of 326 IAC Article 13 do not apply to the source because the source does not have any motor vehicles operated or registered in Clark, Floyd, Lake, or Porter Counties, or vehicles that commute to Jefferson County, Kentucky from Indiana as described in Section 13-1.1-2.

Article 14

With the exception of 326 IAC 14-10 (Emission Standards for Asbestos; Demolition and Renovation Operations), the source is not subject to the provisions of 326 IAC Article 14 because the source does not belong to any of the following categories or sources regulated by Article 14:

(a) sources of asbestos as listed in section 14-2-1;

(b) sources of beryllium as listed in section 14-3-1;

(c) rocket motor test sites as listed in section 14-4-1;

(d) sources of mercury as listed in section 14-5-1;

(e) sources of vinyl chloride as listed in section 14-6-1;

(f) fugitive emission sources of benzene as listed in section 14-7-1;

(g) general fugitive emission sources from equipment leaks as listed in section 14-8-1; and

(h) coke by-product recovery plants as described in section 14-9-1.

Article 15

The requirements of 326 IAC Article 15 do not apply to the source because the source is not specifically listed in Section 15-1-2.

Article 19
The requirements of 326 IAC Article 19 do not apply to the source because the source is located in Newton County, not Lake or Porter County.

Article 21
The requirements of 326 IAC 21 do not apply to the source because the source contains no "affected units" and is not an "affected facility" as that term is defined in 40 CFR Parts 72 through 78 (for detailed explanation see the section below regarding "Federal Regulations").

Article 22
Except for Subpart F, as stated in Condition C.21 (Compliance with 40 CFR 82 and 326 IAC 22-1) of the permit, the requirements of 40 CFR Part 82 and 326 IAC Article 22 are not applicable to the source (for detailed explanation see the section below regarding "Federal Regulations").

II. FEDERAL REGULATIONS
The determinations are based on information submitted by Capitol Products Corp. in the permit application. Any change or modification to any equipment listed in the permit shall require a permit modification.

40 CFR Part 52
The requirements of 40 CFR §§ 52.21(b) through (w), as incorporated into the Indiana State Implementation Plan at 40 CFR § 52.793(b), do not apply to the source at the time this Part 70 permit is issued because it is not a "major stationary source," as that term is defined in 40 CFR § 52.21(b)(1), of any of the six criteria pollutants subject to regulation under the Clean Air Act and because there have not been any "major modifications" of the source as that term is defined in 40 CFR § 52.21(b)(2). The requirements of 40 CFR § 52.21(b)(2) do not apply because the source is not located in a nonattainment area.

40 CFR Part 55
The requirements of 40 CFR Part 55 do not apply because the source is not an "OCS source" as that term is defined at 40 CFR § 55.2.

40 CFR Part 60
(a) Subparts K, Ka, and Kb do not apply because the two (2) 30,000 gallon propane storage tanks each have a capacity of less than 40,000 gallons and the true vapor pressure of liquid propane is less than 3.5 kiloPascals, and all other VOC and HAP storage containers have capacities less than 10,000 gallons.
(b) Subparts D, Da, Db, and Dc do not apply to the source because the one (1) anodizing boiler, known as ANOD-2 has a heat input capacity less than 10 million British thermal units per hour and was not constructed, reconstructed, or modified after June 9, 1989.
(c) The source is not subject to the following Subparts of 40 CFR Part 60 because the source does not contain any equipment belonging to any of the source categories regulated by these standards:
    (1) Subparts E and Ec – Incinerators;
    (2) Subpart Ea and Eb – Municipal Waste Combustors;
    (3) Subpart F – Portland Cement Plants;
    (4) Subpart G – Nitric Acid Plants;
    (5) Subpart H – Sulfuric Acid Plants;
    (6) Subpart I – Hot Mix Asphalt Facilities;
    (7) Subpart J – Petroleum Refineries;
    (8) Subpart L – Secondary Lead Smelters;
    (9) Subpart M – Secondary Brass and Bronze Production Plants;
    (10) Subparts N and Na – Basic Oxygen Process Furnaces;

(11) Subpart O – Sewage Treatment Plants;
(12) Subpart P – Primary Copper Smelters;
(13) Subpart Q – Primary Zinc Smelters;
(14) Subpart R – Primary Lead Smelters;
(15) Subpart S – Primary Aluminum Reduction Plants;
(16) Subpart T – Wet-Process Phosphoric Acid Plants;
(17) Subpart U – Superphosphoric Acid Plants;
(18) Subpart V – Diammonium Phosphate Plants;
(19) Subpart W – Triple Superphosphate Plants;
(20) Subpart X – Granular Triple Superphosphate Storage Facilities;
(21) Subpart Y – Coal Preparation Plants;
(22) Subpart Z – Ferroalloy Production Facilities;
(23) Subparts AA and AAa – Electric Arc Furnaces;
(24) Subpart BB – Kraft Pulp Mills;
(25) Subpart CC – Glass Manufacturing Plants;
(26) Subpart DD – Grain Elevators;
(27) Subpart EE – Surface Coating of Metal Furniture;
(28) Subpart GG – Stationary Gas Turbines;
(29) Subpart HH – Lime Manufacturing Plants;
(30) Subpart KK – Lead-Acid Battery Manufacturing Plants;
(31) Subpart LL – Metallic Mineral Processing plants;
(32) Subpart MM – Automobile and Light Duty Truck Surface Coating Operations;
(33) Subpart NN – Phosphate Rock Plants;
(34) Subpart PP – Ammonium Sulfate Manufacture;
(35) Subpart QQ – Publication Rotogravure Printing;
(36) Subpart RR – Pressure Sensitive Tape and Label Surface Coating Operations;
(37) Subpart SS – Industrial Surface Coating: Large Appliances;
(38) Subpart TT – Metal Coil Surface Coating;
(39) Subpart UU – Asphalt Processing and Asphalt Roofing Manufacture;
(40) Subpart VV – Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry;
(41) Subpart WW – Beverage Can Surface Coating Industry;
(42) Subpart XX – Bulk Gasoline Terminals;
(43) Subpart AAA – New Residential Wood Heaters;
(44) Subpart BBB – Rubber Tire Manufacturing Industry;
(45) Subpart DDD – Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry;
(46) Subpart FFF – Flexible Vinyl and Urethane Coating and Printing;
(47) Subpart GGG – Equipment Leaks of VOC in Petroleum Refineries;
(48) Subpart HHH – Synthetic Fiber Production Facilities;
(49) Subpart III – Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Processes;
(50) Subpart JJJ – Petroleum Dry Cleaners;
(51) Subpart KKK – Equipment Leaks of VOC From Onshore Natural Gas Processing Plants;
(52) Subpart LLL – Onshore Natural Gas Processing;
(53) Subpart NNN – Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations;
(54) Subpart OOO – Nonmetallic Mineral Processing Plants;
(55) Subpart PPP – Wool Fiberglass Insulation Manufacturing Plants;
(56) Subpart QQQ – Petroleum Refinery Wastewater Systems;
(57) Subpart RRR – Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor

Processes;
(58) Subpart SSS – Magnetic Tape Coating Facilities;
(59) Subpart TTT – Surface Coating of Plastic Parts for Business Machines;
(60) Subpart UUU – Calciners and Dryers in Mineral Industries;
(61) Subpart VVV – Polymeric Coating of Supporting Substrates Facilities; and
(62) Subpart WWW – Municipal Solid Waste Landfills.

40 CFR Part 61

(a) The requirements of 40 CFR § 61.142 are not applicable because the source is not an asbestos mill, 40 CFR § 61.144 is not applicable because the source does not perform manufacturing using asbestos, 40 CFR § 61.146 is not applicable because the source does not spray asbestos-containing materials, 40 CFR § 61.147 is not applicable because the source does not perform fabricating using asbestos-containing materials, 40 CFR § 61.149, 40 CFR § 61.151, and 40 CFR § 61.154 are not applicable because the source is not an active or inactive waste disposal site, and 40 CFR § 61.155 is not applicable because the source does not convert asbestos-containing materials to non-asbestos.

(b) The source is not subject to the following Subparts of 40 CFR Part 61 because the source does not belong to any of the source categories regulated by these standards:
(1) Subpart B – Radon Emissions From Underground Uranium Mines;
(2) Subpart C – Beryllium;
(3) Subpart D – Beryllium Rocket Motor Firing;
(4) Subpart E – Mercury;
(5) Subpart F – Vinyl Chloride;
(6) Subpart H – Radionuclides Other Than Radon From Department of Energy Facilities;
(7) Subpart I – Radionuclide Emissions From Federal Facilities Other Than Nuclear Regulatory Commission Licensees and Not Covered by Subpart H;
(8) Subpart J – Equipment Leaks (Fugitive Emission Sources) of Benzene;
(9) Subpart K – Radionuclide Emissions from Phosphorous Plants;
(10) Subpart L – Benzene Emissions from Coke Oven By-product Recovery Plants;
(11) Subpart N – Inorganic Arsenic Emissions From Glass Manufacturing Plants;
(12) Subpart O – Inorganic Arsenic Emissions From Primary Copper Smelters;
(13) Subpart P – Inorganic Arsenic Emissions From Arsenic Trioxide; and Metallic Arsenic Production Facilities;
(14) Subpart Q – Radon Emissions From Department of Energy Facilities;
(15) Subpart R – Radon Emissions From Phosphogypsum Stacks;
(16) Subpart T – Radon Emissions from the Disposal of Uranium Mill Tailings;
(17) Subpart V – Equipment Leaks (Fugitive Emission Sources);
(18) Subpart W – Radon Emissions From Operating Mill Tailings;
(19) Subpart Y – Benzene Emissions From Benzene Storage Vessels;
(20) Subpart BB – Benzene Emissions From Benzene Transfer Operations;
(21) Subpart FF – Benzene Waste Operations.

40 CFR Part 63

The source is not subject to the following Subparts of 40 CFR Part 63 because the source does not contain any equipment belonging to any of the source categories regulated by these standards:
(1) Subpart F – Synthetic Organic Chemical Manufacturing Industry;
(2) Subpart G – Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater;
(3) Subpart H – Equipment Leaks;
(4) Subpart I – Certain Processes Subject to the Negotiated Regulation for Equipment Leaks;

(5) Subpart L – Coke Oven Batteries;
(6) Subpart M – Dry Cleaning Facilities;
(7) Subpart N – Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks;
(8) Subpart O – Sterilization Facilities;
(9) Subpart Q – Industrial Process Cooling Towers;
(10) Subpart R – Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations);
(11) Subpart S – Processes that Produce Pulp or Paper;
(12) Subpart T – Halogenated Solvent Cleaning;
(13) Subpart U – Group I Polymers and Resins;
(14) Subpart W – Epoxy Resins Production and Non-Nylon Polyamides Production;
(15) Subpart X – Secondary Lead Smelting;
(16) Subpart Y – Marine Tank Vessel Tank Loading Operations;
(17) Subpart CC – Petroleum Refineries;
(18) Subpart DD – Off-Site Waste and Recovery Operations;
(19) Subpart EE – Magnetic Tape Manufacturing Operations;
(20) Subpart GG – Aerospace Manufacturing and Rework Facilities;
(21) Subpart II – Shipbuilding and Ship Repair (Surface Coating);
(22) Subpart JJ – Wood Furniture Manufacturing Operations;
(23) Subpart KK – Printing and Publishing Industry;
(24) Subpart LL – Primary Aluminum Reduction Plants;
(25) Subpart OO – Tanks—Level 1;
(26) Subpart PP – Containers;
(27) Subpart QQ – Surface Impoundments;
(28) Subpart RR – Individual Drain Systems;
(29) Subpart VV – Oil-Water Separators and Organic-Water Separators;
(30) Subpart EEE – Hazardous Waste Combustors;
(31) Subpart GGG – Pharmaceuticals Production;
(32) Subpart III – Flexible Polyurethane Foam Production; and
(33) Subpart JJJ – Group IV Polymers and Resins.

40 CFR Part 64
The requirements of 40 CFR Part 64 do not apply to the source at this time because the source submitted a timely and complete Title V application before April 20, 1998.

40 CFR Part 72
The requirements of 40 CFR Part 72 do not apply to the source because it does not contain any of the following “affected units” or “affected sources:”
(1) a unit listed in Table 1 of 40 CFR 73.10(a);
(2) an existing unit that is identified in Table 2 or 3 of 40 CFR 73.10 and any other existing utility unit; or
(3) a utility unit.

40 CFR Part 73
The requirements of 40 CFR Part 73 do not apply to the source because it is not one of the applicable parties as set out in 40 CFR § 73.2.

40 CFR Part 74
The requirements of 40 CFR Part 74 do not apply to the source because it is not a combustion or process source that submitted an opt-in permit application to become an opt-in source under 40 CFR § 74.2.

40 CFR Part 75
The requirements of 40 CFR Part 75 do not apply to the source because it contains no “affected units” that are subject to the Acid Rain emission limitations or reduction requirements for SO_2 or NO_x.

40 CFR Part 76
The requirements of 40 CFR Part 76 do not apply to the source because it contains no coal-fired utility units that are subject to an Acid Rain emission limitations or reduction requirements for SO_2 under Phase I or Phase II pursuant to sections 404, 405, or 409 of the Act.

40 CFR Part 77
The requirements of 40 CFR Part 77 do not apply to the source because it contains no “affected units” and is not an “affected facility” under the Acid Rain Program of Part 72.

40 CFR Part 78
The requirements of 40 CFR Part 78 do not apply to the source because it contains no “affected units” and is not an “affected facility” under the Acid Rain Program of Part 72.

40 CFR Part 82
40 CFR Part 82 Subpart A does not apply because the source does not produce, transform, destroy, import or export a controlled substance or import a controlled product as those terms are defined in 40 CFR § 82.3. Subpart B does not apply because the source does not perform services on any motor vehicle air conditioners. Subpart C does not apply because the source does not sell or distribute any Class I or Class II products as defined in appendices A and B to Subpart A of 40 CFR Part 82. Subpart D does not apply because neither the Permittee nor the source is federal department, agency, or instrumentality as defined in 40 CFR § 82.82. Subpart E does not apply because the source does not make or package Class I or Class II substances, does not make any products containing a Class I or Class II substance, and does not make any products with a Class I or Class II substance. Subpart G does not apply because the source does not produce, introduce into commerce, or use any substances that are "alternatives" or "substitutes” as defined in 40 CFR § 82.172. Subpart H does not apply because the source does not test, service, maintain, repair or dispose of equipment that contains halons or use such equipment during technician training as 40 CFR §§ 82.250 and 82.260.

* * *

DISCLAIMER
This Determination of Inapplicability is not exclusive. The omission of any requirement that constitutes an “applicable requirement” as that term is defined in 326 IAC 2-7-1(6) from this Determination will not be deemed a conclusion or determination by the OAM or an admission by the source that such requirement does apply to the source. The determinations are based on information submitted by Capitol Products Corp. in the permit application. Any change or modification to any equipment listed in the permit may require a permit modification and may affect the following applicability determinations.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	**Capitol Products Corporation**
Source Location:	**508 W. Wilson Street, Kentland, Indiana 47951**
County:	**Newton**
SIC Code:	**3354, 3471**
Operation Permit No.:	**T 111-5887-00005**
Permit Reviewer:	**CarrieAnn Ortolani**

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Capitol Products Corporation relating to the operation of an aluminum extrusion and anodizing source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) electrostatic paint spray booth 1, known as paint 1, booth 1, installed in 1984, equipped with electrostatic disc spray guns and dry filters for overspray control, exhausted to S-13, capacity: 15,120 pieces of aluminum per hour.

(b) One (1) electrostatic paint spray booth 2, known as paint 1, booth 2, installed in 1984, equipped with electrostatic disc spray guns and dry filters for overspray control, exhausted to S-14, capacity: 15,120 pieces of aluminum per hour.

(c) One (1) anodizing line, known as ANOD-1, installed in 1984, exhausted to S-15 controlled by a scrubber, S-16 and into the building, consisting of the following twenty-seven (27) tanks containing various liquids, maximum capacity: 30,000 pounds of aluminum parts per hour:

(1) One (1) Brite dip tank and three (3) Brite dip rinse tanks, equipped with a scrubber.

(2) Two (2) anodize tanks containing sulfuric acid and water, equipped with a scrubber.

(3) One (1) color tank containing sulfuric acid or color max and water.

(4) One (1) gold dye tank containing ferric sodium oxalate and water.

(5) Two (2) seal tanks each containing nickel and water or hydrogen fluoride and water.

(6) One (1) caustic cleaner tank.

(7) One (1) etch tank containing NaOH and water, equipped with a scrubber.

(8) One (1) desmut tank containing nitric acid and water, phosphoric acid and water, or sulfuric acid and water.

(9) Fourteen (14) rinse tanks, using only water.

(d) One (1) anodizing boiler, known as ANOD-2, fueled by natural gas and propane as a back up fuel, installed in 1984, exhausted to S-12, heat input capacity: 8.4 million British thermal units per hour.

(e) One (1) billet heater, known as EXTR-1, heater H, fueled by natural gas and propane as a back up fuel, installed in 1991, exhausted to stack S-3, heat input capacity: 8.0 million British thermal units per hour.

(f) One (1) paint bake oven, known as paint 3, paint bake oven P, fueled by natural gas and propane as a back up fuel, installed in 1984, exhausted to S-11, heat input capacity: 9.0 million British thermal units per hour.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Requiring ENSR

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) The following natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, and propane for liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) British thermal units per hour.

(1) One (1) billet heater, known as EXTR-1, heater F, fueled by natural gas and propane as a back-up fuel, installed in 1985, exhausted to S-1, heat input capacity: 5.3 million British thermal units per hour.

(2) One (1) billet heater, known as EXTR-1, heater G, fueled by natural gas and propane as a back-up fuel, installed in 1985, exhausted to S-2, heat input capacity: 5.5 million British thermal units per hour.

(3) One (1) aging oven, known as EXTR-2, aging oven I, fueled by natural gas and propane as a back up fuel, installed in 1972, exhausted to S-4, heat input capacity: 1.8 million British thermal units per hour.

(4) One (1) aging oven, known as EXTR-2, aging oven J, fueled by natural gas and propane as a back up fuel, installed in 1978, exhausted to S-5, heat input capacity: 1.8 million British thermal units per hour.

(5) One (1) pretreatment tank heater, known as PREPAINT 1, heater K, fueled by natural gas and propane as a back up fuel installed in 1972, exhausted to S-6, heat input capacity: 6.0 million British thermal units per hour.

(6) One (1) pretreatment tank heater, known as PREPAINT 1, heater L, fueled by natural gas and propane as a back up fuel, installed in 1984, exhausted to S-7, heat input capacity: 4.5 million British thermal units per hour.

(7) One (1) pretreatment tank heater, known as PREPAINT 1, heater M, fueled by natural gas and propane as a back up fuel, installed in 1972, exhausted to S-8,heat input capacity: 1.5 million British thermal units per hour.

(8) One (1) pretreatment tank heater, known as PREPAINT 1, heater N, fueled by natural gas and propane as a back up fuel, installed in 1984 exhausted to S-9, heat input capacity: 3.0 million British thermal units per hour.

(9) One (1) dry off oven, known as PREPAINT 2, oven O, fueled by natural gas and propane as a back up fuel, installed in 1984, exhausted to S-10, heat input capacity: 2.6 million British thermal units per hour.

(10) One (1) building heater, known as HEAT-1, heater A, fueled by natural gas and propane as a back up fuel, installed in1984, heat input capacity: 4.5 million British thermal units per hour.

(11) One (1) building heater, known as HEAT-1, heater B, fueled by natural gas and propane as a back up fuel, installed in 1980, heat input capacity: 5.3 million British thermal units per hour.

(12) One (1) building heater, known as HEAT-1, heater C, fueled by natural gas and propane as a back up fuel, installed in 1984, heat input capacity: 5.5 million British thermal units per hour.

(13) One (1) building heater, known as HEAT-1, heater D, fueled by natural gas and propane as a back up fuel, installed in 1984, heat input capacity: 5.5 million British thermal units per hour.

(14) One (1) building heater, known as HEAT-1, heater E, fueled by natural gas and propane as a back up fuel, installed in 1972, heat input capacity: 4.9 million British thermal units per hour.

(b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 British thermal units per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 British thermal units per hour.

(c) Combustion source flame safety purging on startup.

(d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

(e) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(f) The following VOC and HAP storage containers:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(2) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.

(g) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.

(h) Machining where an aqueous cutting coolant continuously floods the machining interface.

(i) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6. One (1) self-contained parts washer, installed after January 1, 1980, equipped with a remote solvent reservoir.

(j) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(k) Closed loop heating and cooling systems.

(l) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume.

(m) Any operation using aqueous solutions containing less than one percent (1%) by weight of VOCs excluding HAPs.

(n) Noncontact cooling tower systems with the following:

Forced and induced draft cooling tower system not regulated under a NESHAP.

(o) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(p) Paved and unpaved roads and parking lots with public access.

(q) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(r) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(s) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.

(t) On-site fire and emergency response training approved by the department.

(u) Emergency generators as follows:

Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.

(v) A laboratory as defined in 326 IAC 2-7-1(21)(D).

(w) Other activities or categories:

(1) Buffing facilities, capacity: 1.75 tons per hour.

(2) Six (6) extrusion sawing stations, capacity: 5.0 tons per hour, each.

(3) One (1) debridging sawing operation, capacity: 3.5 tons per hour.

(4) One (1) extrusion chop saw, capacity: 5.0 tons per hour.

(5) Drilling and machining operations, capacity: 2.5 tons per hour, total.

(6) One (1) woodworking saw, 0.25 tons per hour.

(7) Paint pretreatment system.

(8) One (1) deburring machine, installed in 1997, capacity: 0.25 tons per hour.

(9) One (1) thermal barrier and line flush.

(10) Two (2) 30,000 gallon propane storage tanks.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following: list permits, registrations, modifications, exemptions, etc.

(a) Letter of Exemption, issued on September 14, 1981;

(b) Letter of Registration, issued on April 26, 1982;

(c) Consent Decree, approved on March 10, 1986;

(d) OP 56-07-91-0049, issued on August 28, 1987;

(e) CP 111-2823-00005, issued on November 5, 1993; and

(f) OP validation letter for CP 111-2823-00005, issued on November 19, 1993.

All conditions from previous approvals that have not previously been superceded, modified, or replaced in another permit or permit amendment were incorporated into this Part 70 permit except the following:

CP 111-2823-00005, issued on November 5, 1993

Operation Condition 9: That particulate matter emissions from the fuel combustion units other than the anodizing boiler shall be limited to 7.58 pounds per hour, pursuant to 326 IAC 6-3-2. Particulate matter emissions will be considered in compliance with 326 IAC 6-3-2 provided that visible emissions do not exceed 20% opacity.

Reason not incorporated: Particulate emissions from the fuel combustion units result solely from combustion and not from a production process. Fuel use is not counted towards process weight rate. Therefore, the requirements of 326 IAC 6-3-2 are not applicable to the fuel combustion units.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively incomplete Part 70 permit application for the purposes of this review was received on May 16, 1996. Additional information received on August 12, 1996 makes the Part 70 permit application administratively complete. Additional information was received on September 1, 1998 and September 17, 1998.

A notice of completeness letter was mailed to the source on August 15, 1996.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 6 of 6). The emissions from insignificant activities are based on pages 5 and 6 of 6 of Appendix A and calculations supplied in the permit application.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as “emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.”

Pollutant	**Potential Emissions** (tons/year)
PM	608
PM_{10}	605
SO_2	0.211
VOC	3,505
CO	7.37
NO_X	54.0

Note: For the purpose of determining Title V applicability for particulates, PM_{10}, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Hydrogen Fluoride	less than 10
Nickel Compounds	less than 10
Xylene	greater than 10
MEK	greater than 10
Glycol Ethers	greater than 10
Ethyl benzene	greater than 10
Naphthalene	greater than 10
Toluene	greater than 10
MIBK	greater than 10
Formaldehyde	greater than 10
Cumene	less than 10
TOTAL	greater than 25

(a) The potential emissions (as defined in 326 IAC 1-2-55) of VOC and PM_{10} are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential emissions (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in 326 IAC 1-2-55) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1996 emission data indicate the year of the most recent emission data OAM emission data.

Pollutant	**Actual Emissions** (tons/year)
PM	2.28
PM_{10}	2.28
SO_2	negligible
VOC	122
CO	negligible
NO_X	0.402
HAP (Formaldehyde)	0.106
HAP (MEK)	1.96
HAP (Naphthalene)	0.942
HAP (Ethyl Benzene)	5.06
HAP (Toluene)	0.323
HAP (Xylenes)	47.3
HAP (Antimony Compounds)	0.001
HAP (Chromium Compounds)	0.005
HAP (Cobalt Compounds)	0.001
HAP (Glycol Ethers)	9.25
HAP (Nickel Compounds)	0.0001

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM_{10}	SO_2	VOC	CO	NO_X	HAPs
two (2) electrostatic paint spray booths, including cleanup solvents	0.407	0.407	0.00	246	0.00	0.00	197
one (1) anodizing line	4.16	4.16	0.00	0.00	0.00	1.17	0.025
one (1) anodizing boiler	0.442	0.442	0.022	0.196	0.773	5.48	0.00
one (1) billet heater and one (1) paint bake oven P	0.893	0.893	0.045	0.396	1.56	11.1	0.00
insignificant activities	9.00	6.00	0.144	2.50	5.03	35.7	1.00
Total Emissions	14.9	11.9	0.211	249	7.36	53.5	198

County Attainment Status

The source is located in Newton County.

Pollutant	Status
PM_{10}	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Newton County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) The one (1) anodizing boiler, known as ANOD-2 is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40b and 60.40c), Subpart Db and Dc, because the capacity of the boiler is less than 10 million British thermal units per hour.

(b) The two (2) 30,000 gallon propane storage tanks are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110, 60.110a,and 60.110b), Subpart K, Ka, and Kb because the capacity of each tank is less than 40,000 gallons and the true vapor pressure of liquid propane is less than 3.5 kiloPascals. All other VOC and HAP storage containers have capacities less than 10,000 gallons. Therefore, the requirements of 40 CFR 60.110, 60.110a and 60.110b are not applicable.

(c) This source is not subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63, Subpart N, and 326 IAC 20-1-1), because there is no chromium electroplating performed at this source.

State Rule Applicability - Entire Source

326 IAC 1-7 (Stack Height Provisions)

The only facilities at this source with potential emissions of 25 tons per year or more of PM or SO_2 are the two (2) electrostatic paint spray booths. Therefore, the two (2) electrostatic paint spray booth stacks, S-13 and S-14, with a potential to emit PM greater than 25 tons per year, are subject to the requirements of 326 IAC 1-7. Pursuant to 326 IAC 1-7-5 (Exemptions; limitations), since the actual emissions after controls are less than 25 tons per year of PM, the two (2) electrostatic paint spray booths stacks, S-13 and S-14, are exempt from the requirements of 326 IAC 1-7-3(a). All other requirements of 326 IAC 1-7 apply to the two (2) electrostatic paint spray booths.

326 IAC 2-2 (Prevention of Significant Deterioration)

(a) The source has agreed to limit VOC usage by the two (2) electrostatic paint spray booths, including cleanup activities, to 246 tons per twelve (12) consecutive months. Therefore, the potential to emit VOC from the entire source, including insignificant activities, is less than 250 tons per year, and the requirements of 326 IAC 2-2, PSD, are not applicable. This limitation was contained in CP 111-2823-00005, issued on November 5, 1993.

(b) The source will be required to operate the dry filters at all times when the two (2) electrostatic paint spray booths are in operation. Therefore, the potential to emit PM from the entire source, including insignificant activities, is less than 250 tons per year and the requirements of 326 IAC 2-2, PSD, are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four

(24) consecutive readings as determined by 326 IAC 5-1-4,

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-1-3.4 New Source Toxics Control

Since the entire source was constructed prior to July 27, 1997, the requirements of 326 IAC 2-1-3.4 are not applicable.

326 IAC 6-2-4 (Particulate Emissions Limitations for Facilities Constructed after September 21, 1983)

The one (1) anodizing boiler, known as ANOD-2 with a capacity of 8.4 million British thermal units per hour, must comply with the particulate matter emission rate specified by the following equation given in 326 IAC 6-2-4.

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

$$Pt = 1.09/(8.4)^{0.26} = 0.6 \text{ lb/MMBtu heat input}$$

Based on Appendix A, the potential PM emission rate is:

(0.442 tons/yr) × (2,000 lbs/ton) / (8760 hrs/yr) = 0.101 lbs/hr / 8.4 MMBtu/hr = 0.012 lbs PM / MMBtu

Thus, the boiler will comply with the requirements of 326 IAC 6-2-4.

326 IAC 6-3-2 (Process Operations)

(a) Pursuant to CP 111-2823-00005, issued on November 5, 1993, the particulate matter (PM) from the two (2) electrostatic paint booths shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The dry filters shall be in operation at all times when the two (2) electrostatic paint booths are

in operation, in order to comply with this limit.

(b) Pursuant to the exemption, issued on September 14, 1981, and the registration issued on April 26, 1982, the particulate matter (PM) from the one (1) anodizing line, known as ANOD-1 shall be limited to 25.2 pounds per hour when operating at a process weight rate of 15 tons per hour. Since potential emissions from the one (1) anodizing line are 3.97 pounds per hour the one (1) anodizing line will comply with this rule. The allowable emissions are based on the following equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour.

(c) The insignificant buffing facilities, six (6) extrusion sawing stations, one (1) debridging sawing operation, one (1) extrusion chop saw, drilling and machining operations, one (1) wood-working saw, paint pretreatment system, one (1) deburring machine, and the following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment, will be subject to the requirements of 326 IAC 6-3-2. These facilities shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the two (2) electrostatic paint spray booths shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the spray booth is in compliance with this requirement for the majority of coatings used. The source will be required to record and report the daily volume weighted average VOC content of coatings used in order to show compliance with this rule.

326 IAC 8-3-2 (Cold Cleaner Operations)

The one (1) parts washer installed after January 1, 1980, is subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operations). Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

Since the one (1) parts washer is equipped with a remote solvent reservoir, the requirements of 326 IAC 8-3-5 are not applicable.

326 IAC 9-1 (Carbon Monoxide Emission Limitations)

Since this source does not have petroleum refining emissions, ferrous metal smelters emissions, and refuse incineration and burning equipment, the requirements of 326 IAC 9-1-2 are not applicable.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(a) The two (2) electrostatic paint spray booths have applicable compliance monitoring conditions as specified below:

(1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray from the surface coating booth stacks (S-13 and S-14) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation

of this permit.

(2) Weekly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for overspray control must operate properly to ensure compliance with 326 IAC 6-3-2 (Process Operations) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

(a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.

(b) See pages 2 , 3 and 4 of 6 of the attached calculations for detailed air toxic calculations.

Conclusion

The operation of this aluminum extrusion and anodizing source shall be subject to the conditions of the attached proposed Part 70 Permit No. T 111-5887-00005.

Appendix A: Federal Potential Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Capitol Products Corporation
Plant Location: 508 W. Wilson Street, Kentland, Indiana 47951
Part 70: T111-5887
Plt ID: 111-00005
County: Newton
Permit Reviewer: CarrieAnn Ortolani
Date: May 16, 1996

Material	Density (lb/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential tons per year	lb VOC /gal solids	Transfer Efficiency
Alternate Materials																	
DURANAR sandstone	9.03	68.85%	0.0%	68.9%	0.0%	18.20%	0.00420	30240	1.000	6.22	6.22	789.63	18951.08	3458.57	156.48	34.16	90%
DURANAR Interstate Green	9.08	68.75%	0.0%	68.8%	0.0%	17.70%	0.00420	30240	1.000	6.24	6.24	792.85	19028.34	**3472.67**	157.85	35.27	90%
DURANAR Pewter	8.88	70.00%	0.0%	70.0%	0.0%	17.80%	0.00420	30240	1.000	6.22	6.22	789.48	18947.56	3457.93	148.20	34.92	90%
River Rouge Red	9.10	67.96%	0.0%	68.0%	0.0%	18.20%	0.00420	30240	1.000	6.18	6.18	785.46	18851.12	3440.33	162.20	33.98	90%
Clear	8.55	72.94%	0.0%	72.9%	0.0%	17.80%	0.00420	30240	1.000	6.24	6.24	792.07	19009.65	3469.26	128.71	35.04	90%
Inhibitive primer	9.05	63.93%	0.0%	63.9%	0.0%	21.40%	0.00420	30240	1.000	5.79	5.79	734.83	17635.82	3218.54	181.59	27.04	90%
Common Materials																	
Polychron III White	11.7	27.64%	0.0%	27.6%	0.0%	56.10%	0.00420	30240	1.000	3.23	3.23	410.03	9840.64	1795.92	470.16	5.75	90%
Mar Resist Weathershield White	12.1	26.26%	0.0%	26.3%	0.0%	56.67%	0.00420	30240	1.000	3.17	3.17	403.23	9677.50	1766.14	495.95	5.60	90%
SNE Mar Resistant White	12.1	26.28%	0.0%	26.3%	0.0%	56.67%	0.00420	30240	1.000	3.18	3.18	403.87	9692.88	1768.95	496.22	5.61	90%
LDA3000 White H/S	11.4	26.70%	0.0%	26.7%	0.0%	58.20%	0.00420	30240	1.000	3.03	3.03	385.23	9245.53	1687.31	463.22	5.21	90%
New Coradco White H/S Enamel	11.5	28.25%	0.0%	28.3%	0.0%	55.65%	0.00420	30240	1.000	3.25	3.25	412.26	9894.20	1805.69	458.61	5.83	90%
Polychron III Bronze	9.0	32.40%	0.0%	32.4%	0.0%	66.50%	0.00420	30240	1.000	2.93	2.93	371.59	8918.16	1627.56	339.58	4.40	90%
Low Gloss Black H/S Enamel	9.5	27.00%	0.0%	27.0%	0.0%	52.50%	0.00420	30240	1.000	2.57	2.57	326.46	7835.07	1429.90	386.60	4.90	90%
Polychron III Drift wood	11.0	29.26%	0.0%	29.3%	0.0%	55.96%	0.00420	30240	1.000	3.22	3.22	408.79	9810.91	1790.49	432.88	5.75	90%
Drift wood H/S Enamel	10.6	28.08%	0.0%	28.1%	0.0%	58.06%	0.00420	30240	1.000	2.97	2.97	376.97	9047.20	1651.11	422.89	5.11	90%
Aluchron Hartford Green	9.4	32.14%	0.0%	32.1%	0.0%	58.47%	0.00420	30240	1.000	3.01	3.01	381.67	9160.09	1671.72	352.96	5.14	90%
Adobe Bronze H/S Enamel	9.8	32.40%	0.0%	32.4%	0.0%	56.35%	0.00420	30240	1.000	3.18	3.18	404.51	9708.25	1771.76	369.66	5.65	90%
Polychron III White	11.3	31.50%	0.0%	31.5%	0.0%	51.29%	0.00420	30240	1.000	3.57	3.57	452.89	10869.24	1983.64	431.36	6.95	90%
Flex Black	8.4	54.84%	0.0%	54.8%	0.0%	36.96%	0.00420	30240	1.000	4.61	4.61	585.07	14041.68	2562.61	211.03	12.46	90%
New Running Board Black	10.0	34.08%	0.0%	34.1%	0.0%	52.88%	0.00420	30240	1.000	3.42	3.42	434.57	10429.79	1903.44	368.18	6.47	90%
Artic White H/S Enamel	11.7	25.53%	0.0%	25.5%	0.0%	59.02%	0.00420	30240	1.000	2.99	2.99	379.37	9104.98	1661.66	484.70	5.06	90%
Polychron III Parrette White	13.0	19.78%	0.0%	19.8%	0.0%	73.40%	0.00420	30240	1.000	2.57	2.57	326.59	7838.12	1430.46	**580.14**	3.50	90%
Kinco Beige H/S Enamel	11.9	24.59%	0.0%	24.6%	0.0%	60.00%	0.00420	30240	1.000	2.93	2.93	371.96	8927.15	1629.20	499.63	4.88	90%
Polychron III Norco Beige	9.6	37.39%	0.0%	37.4%	0.0%	51.15%	0.00420	30240	1.000	3.58	3.58	454.46	10907.11	1990.55	333.32	7.00	90%
Quaker Bronze RTS Enamel	11.1	27.00%	0.0%	27.0%	0.0%	65.00%	0.00420	30240	1.000	2.98	2.98	378.93	9094.28	1659.71	448.74	4.59	90%
Fleetwood White Flex H/S Enamel	11.6	29.26%	0.0%	29.3%	0.0%	52.73%	0.00420	30240	1.000	3.39	3.39	429.97	10319.29	1883.27	455.31	6.42	90%
Coradco Brown H/S Enamel	9.1	34.97%	0.0%	35.0%	0.0%	56.45%	0.00420	30240	1.000	3.18	3.18	403.29	9678.85	1766.39	328.48	5.62	90%
Polychron III Pewter	9.5	33.18%	0.0%	33.2%	0.0%	57.29%	0.00420	30240	1.000	3.14	3.14	398.66	9567.75	1746.11	351.64	5.48	90%
Valex Beige #770H/ Enamel	11.5	26.69%	0.0%	26.7%	0.0%	56.67%	0.00420	30240	1.000	3.07	3.07	389.49	9347.83	1705.98	468.59	5.41	90%
Polychron III Hartford Green	9.8	32.57%	0.0%	32.6%	0.0%	57.09%	0.00420	30240	1.000	3.18	3.18	403.32	9679.76	1766.56	365.73	5.56	90%
Polyceram 1400 Pella White	11.4	29.37%	0.0%	29.4%	0.0%	53.54%	0.00420	30240	1.000	3.33	3.33	423.38	10161.13	1854.41	445.95	6.23	90%
State Potential Emissions			**Add worst case coating to all solvents**									**793**	**19028**	**3473**	**580**		

Control Technology Emissions (Combustion)																
						Emission Factors							Emissions			
Type	Number	Capacity	Gas usage	PM	PM10	SO2	NOx	VOC	CO		PM	PM10	SO2	NOx	VOC	CO
		MMBtu/hr	MMCF/yr	lb/MMCF	lb/MMCF	lb/MMCF	lb/MMCF	lb/MMCF	lb/MMCF		tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr
Catalytic			0.0	3.0	3.0	0.6	100.0	5.3	35.0		0.0	0.0	0.0	0.0	0.0	0.0
Thermal			0.0	3.0	3.0	0.6	140.0	2.8	20.0		0.0	0.0	0.0	0.0	0.0	0.0
Total			0.0								0.0	0.0	0.0	0.0	0.0	0.0
										Control Efficiency		Controlled	Controlled	Controlled	Controlled	
										VOC	PM	VOC pounds	VOC pounds	VOC	Particulate	
										0	**0.99**	per hour	per day	tons/yr	tons/yr	

Controlled Emissions due to Surface Coating Operations and Controls **793** **19028** **3473** **5.80**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * Flash-off
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day) * Flash-off
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs) * Flash-off
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Flash-off
Total = Worst Coating + Sum of all solvents used

HAP Emission Calculations

Company Name: Capitol Products Corporation
Plant Location: 508 W. Wilson Street, Kentland, Indiana 47951
Part 70: T111-5887
Plt ID: 111-00005
County: Newton
Permit Reviewer: CarrieAnn Ortolani
Date: May 16, 1996

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Weight % MIBK	Weight % Toluene	Weight % Glycol Ethers	Weight % Formaldehyde	Weight % Ethyl benzene	Weight % Xylene	Weight % MEK	Weight % Naphthalene	Weight % Cumene	MIBK Emissions (tons/yr)	Toluene Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)	Formaldehyde Emissions (tons/yr)	Ethyl benzene Emissions (tons/yr)	Xylene Emissions (tons/yr)	MEK Emissions (tons/yr)	Naphthalene Emissions (tons/yr)	Cumene Emissions (tons/yr)	Total HAP Emissions (tons/yr)
Alternate Materials																							
DURANAR sandstone	9.79	0.00288	30240	1.00	0.00%	14.95%	11.11%	0.00%	2.00%	8.99%	0.00%	0.00%	0.00%	0.00	558.31	414.90	0.00	74.69	335.73	0.00	0.00	0.00	1383.63
Xylol	7.24	0.00104	30240	1.00	0.00%	0.00%	0.00%	0.00%	25.00%	90.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	249.33	897.57	0.00	0.00	0.00	997.30
Butyl carbitol	7.95	0.00029	30240	1.00	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	305.37	0.00	0.00	0.00	0.00	0.00	0.00	305.37
DURANAR Interstate Green	9.95	0.00276	30240	1.00	0.00%	15.31%	10.28%	0.00%	2.15%	9.65%	0.00%	0.00%	0.00%	0.00	556.88	373.92	0.00	78.20	351.01	0.00	0.00	0.00	1360.01
Xylol	7.24	0.00111	30240	1.00	0.00%	0.00%	0.00%	0.00%	25.00%	90.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	266.11	957.99	0.00	0.00	0.00	1064.43
Butyl carbitol	7.95	0.00033	30240	1.00	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	347.49	0.00	0.00	0.00	0.00	0.00	0.00	347.49
DURANAR Pewter	9.54	0.00292	30240	1.00	0.00%	15.51%	11.03%	0.00%	2.21%	9.91%	0.00%	0.00%	0.00%	0.00	572.27	406.97	0.00	81.54	365.65	0.00	0.00	0.00	1426.43
Xylol	7.24	0.00105	30240	1.00	0.00%	0.00%	0.00%	0.00%	25.00%	90.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	251.72	906.20	0.00	0.00	0.00	1006.89
Butyl carbitol	7.95	0.00023	30240	1.00	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	242.19	0.00	0.00	0.00	0.00	0.00	0.00	242.19
River Rouge Red	9.89	0.00292	30240	1.00	0.00%	15.44%	10.65%	0.00%	2.14%	9.60%	0.00%	0.00%	0.00%	0.00	590.58	407.37	0.00	81.86	367.20	0.00	0.00	0.00	1447.01
Xylol	7.24	0.00117	30240	1.00	0.00%	0.00%	0.00%	0.00%	25.00%	90.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	280.49	1009.77	0.00	0.00	0.00	1121.97
Butyl carbitol	7.95	0.00012	30240	1.00	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	126.36	0.00	0.00	0.00	0.00	0.00	0.00	126.36
Clear	9.09	0.00288	30240	1.00	0.00%	19.19%	9.80%	0.00%	2.26%	10.14%	0.00%	0.00%	0.00%	0.00	665.41	339.81	0.00	78.36	351.60	0.00	0.00	0.00	1435.18
Xylol	7.24	0.00104	30240	1.00	0.00%	0.00%	0.00%	0.00%	25.00%	90.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	249.33	897.57	0.00	0.00	0.00	997.30
Butyl carbitol	7.95	0.00029	30240	1.00	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	305.37	0.00	0.00	0.00	0.00	0.00	0.00	305.37
Inhibitive primer	10.28	0.00250	30240	1.00	0.00%	0.37%	2.11%	0.00%	1.36%	5.37%	0.00%	0.00%	0.10%	0.00	12.59	71.82	0.00	46.29	182.79	0.00	0.00	3.40	313.51
Xylol	7.24	0.00170	30240	1.00	0.00%	0.00%	0.00%	0.00%	25.00%	90.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	407.55	1467.19	0.00	0.00	0.00	1630.21
Common Materials																							
Polychron III White	12.32	0.00357	30240	1.00	0.00%	0.00%	5.00%	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00	0.00	291.28	0.00	0.00	291.28	0.00	0.00	0.00	582.55
Xylol	7.24	0.00063	30240	1.00	0.00%	0.00%	0.00%	0.00%	25.00%	90.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	151.03	543.72	0.00	0.00	0.00	604.14
S-150	7.49	0.00063	30240	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	11.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	68.75	0.00	68.75
Butyl carbitol	7.95	0.00063	30240	1.00	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	663.38	0.00	0.00	0.00	0.00	0.00	0.00	663.38
Mar Resist Weathershield White	13.30	0.00340	30240	1.00	0.00%	0.00%	0.00%	0.05%	0.00%	11.00%	2.00%	0.00%	0.00%	0.00	0.00	0.00	2.70	0.00	658.84	119.79	0.00	0.00	781.32
Xylol	7.24	0.00080	30240	1.00	0.00%	0.00%	0.00%	0.00%	25.00%	90.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	191.79	690.44	0.00	0.00	0.00	767.16
S-150	7.49	0.00080	30240	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	11.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	87.30	0.00	87.30
SNE Mar Resistant White	13.35	0.00340	30240	1.00	0.00%	0.00%	0.00%	0.02%	0.00%	10.00%	1.00%	0.00%	0.00%	0.00	0.00	0.00	1.26	0.00	601.20	60.12	0.00	0.00	662.58
Xylol	7.24	0.00080	30240	1.00	0.00%	0.00%	0.00%	0.00%	25.00%	90.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	191.79	690.44	0.00	0.00	0.00	767.16
S-150	7.49	0.00080	30240	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	11.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	87.30	0.00	87.30
LDA3000 White H/S	12.44	0.00330	30240	1.00	0.00%	0.00%	0.00%	0.02%	0.00%	10.00%	1.00%	0.00%	0.00%	0.00	0.00	0.00	1.14	0.00	543.74	54.37	0.00	0.00	599.25
Xylol	7.24	0.00090	30240	1.00	0.00%	0.00%	0.00%	0.00%	25.00%	90.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	215.76	776.75	0.00	0.00	0.00	863.05
S-150	7.49	0.00090	30240	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	11.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	98.21	0.00	98.21
New Coradco White H/S Enamel	12.77	0.00320	30240	1.00	0.00%	0.00%	0.00%	0.02%	0.00%	12.00%	1.00%	0.00%	0.00%	0.00	0.00	0.00	1.08	0.00	649.50	54.12	0.00	0.00	704.71
S-150	7.49	0.00100	30240	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	11.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	109.13	0.00	109.13
Polychron III Bronze	9.03	0.00420	30240	1.00	0.00%	0.00%	5.00%	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00	0.00	251.17	0.00	0.00	251.17	0.00	0.00	0.00	502.33
Low Gloss Black H/S Enamel	10.15	0.00340	30240	1.00	0.00%	0.00%	0.00%	0.03%	0.00%	18.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	1.19	0.00	822.76	0.00	0.00	0.00	823.95
S-150	7.49	0.00080	30240	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	11.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	87.30	0.00	87.30
Polychron III Drift wood	11.55	0.00380	30240	1.00	0.00%	0.00%	5.00%	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00	0.00	290.66	0.00	0.00	290.66	0.00	0.00	0.00	581.33
S-150	7.49	0.00040	30240	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	11.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	43.65	0.00	43.65
Drift wood H/S Enamel	11.56	0.00340	30240	1.00	0.00%	0.00%	0.00%	0.03%	0.00%	11.00%	1.00%	0.00%	0.00%	0.00	0.00	0.00	1.30	0.00	572.64	52.06	0.00	0.00	626.00
Xylol	7.24	0.00100	30240	1.00	0.00%	0.00%	0.00%	0.00%	25.00%	90.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	239.74	863.05	0.00	0.00	0.00	958.95
S-150	7.49	0.00100	30240	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	11.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	109.13	0.00	109.13
Aluchron Hartford Green	9.92	0.00340	30240	1.00	0.00%	0.00%	0.00%	0.00%	5.00%	10.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	223.37	446.73	0.00	0.00	0.00	670.10
Xylol	7.24	0.00080	30240	1.00	0.00%	0.00%	0.00%	0.00%	25.00%	90.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	191.79	690.44	0.00	0.00	0.00	767.16
Adobe Bronze H/S Enamel	10.67	0.00310	30240	1.00	0.00%	0.00%	5.00%	0.06%	3.00%	12.00%	0.00%	0.00%	0.00%	0.00	0.00	219.05	2.67	131.43	525.73	0.00	0.00	0.00	878.89
Xylol	7.24	0.00110	30240	1.00	0.00%	0.00%	0.00%	0.00%	25.00%	90.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	263.71	949.36	0.00	0.00	0.00	1054.84
S-150	7.49	0.00110	30240	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	11.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	120.04	0.00	120.04
Polychron III White	12.32	0.00340	30240	1.00	0.00%	0.00%	5.00%	0.00%	0.00%	10.00%	0.00%	0.00%	0.00%	0.00	0.00	277.41	0.00	0.00	554.81	0.00	0.00	0.00	832.22
Xylol	7.24	0.00080	30240	1.00	0.00%	0.00%	0.00%	0.00%	25.00%	90.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	191.79	690.44	0.00	0.00	0.00	767.16
S-150	7.49	0.00080	30240	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	11.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	87.30	0.00	87.30
Butyl carbitol	7.95	0.00080	30240	1.00	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	842.39	0.00	0.00	0.00	0.00	0.00	0.00	842.39
Flex Black	8.54	0.00370	30240	1.00	3.38%	0.00%	0.00%	0.05%	3.08%	12.81%	0.00%	1.00%	0.00%	141.50	0.00	0.00	2.09	128.90	536.12	0.00	41.85	0.00	850.47
Xylol	7.24	0.00050	30240	1.00	0.00%	0.00%	0.00%	0.00%	25.00%	90.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	119.87	431.53	0.00	0.00	0.00	479.47
New Running Board Black	10.32	0.00400	30240	1.00	0.00%	0.00%	0.00%	0.07%	0.00%	14.00%	1.00%	0.00%	0.00%	0.00	0.00	0.00	3.83	0.00	765.46	54.68	0.00	0.00	823.97
Butyl Carbitol	7.95	0.00020	30240	1.00	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	210.60	0.00	0.00	0.00	0.00	0.00	0.00	210.60
Artic White H/S Enamel	12.76	0.00330	30240	1.00	0.00%	0.00%	0.00%	0.05%	0.00%	12.00%	1.00%	0.00%	0.00%	0.00	0.00	0.00	2.90	0.00	669.27	55.77	0.00	0.00	727.94
Xylol	7.24	0.00090	30240	1.00	0.00%	0.00%	0.00%	0.00%	25.00%	90.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	215.76	776.75	0.00	0.00	0.00	863.05
Polychron III Parrette White	13.00	0.00420	30240	1.00	0.00%	0.00%	5.00%	0.00%	0.00%	10.00%	0.00%	0.00%	0.00%	0.00	0.00	361.59	0.00	0.00	723.18	0.00	0.00	0.00	1084.78
Kinco Beige H/S Enamel	13.08	0.00340	30240	1.00	0.00%	0.00%	0.00%	0.02%	0.00%	10.00%	2.00%	0.00%	0.00%	0.00	0.00	0.00	1.24	0.00	589.04	117.81	0.00	0.00	708.08
S-150	7.31	0.00080	30240	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	11.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	85.20	0.00	85.20
Polychron III Norco Beige	10.35	0.00310	30240	1.00	0.00%	0.00%	5.00%	0.00%	0.00%	10.00%	0.00%	0.00%	0.00%	0.00	0.00	212.48	0.00	0.00	424.97	0.00	0.00	0.00	637.45
Xylol	7.24	0.00110	30240	1.00	0.00%	0.00%	0.00%	0.00%	25.00%	90.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	263.71	949.36	0.00	0.00	0.00	1054.84
S-150	7.49	0.00110	30240	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	11.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	120.04	0.00	120.04
Butyl carbitol	7.95	0.00110	30240	1.00	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	1158.29	0.00	0.00	0.00	0.00	0.00	0.00	1158.29
Quaker Bronze RTS Enamel	11.05	0.00420	30240	1.00	0.00%	0.00%	0.00%	0.06%	0.00%	3.00%	3.00%	0.00%	0.00%	0.00	0.00	0.00	3.75	0.00	184.41	184.41	0.00	0.00	372.57
Fleetwood White Flex H/S Enamel	12.25	0.00380	30240	1.00	0.00%	0.00%	0.00%	0.06%	0.00%	10.00%	1.00%	0.00%	0.00%	0.00	0.00	0.00	3.76	0.00	616.56	61.66	0.00	0.00	681.98
Xylol	7.24	0.00040	30240	1.00	0.00%	0.00%	0.00%	0.00%	25.00%	90.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	95.89	345.22	0.00	0.00	0.00	383.58
Coradco Brown H/S Enamel	9.71	0.00320	30240	1.00	0.00%	0.00%	3.00%	0.04%	0.00%	15.00%	2.00%	0.00%	0.00%	0.00	0.00	123.47	1.44	0.00	617.33	82.31	0.00	0.00	824.55
Xylol	7.24	0.00100	30240	1.00	0.00%	0.00%	0.00%	0.00%	25.00%	90.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	239.74	863.05	0.00	0.00	0.00	958.95
S-150	7.49	0.00100	30240	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	11.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	109.13	0.00	109.13
Polychron III Pewter	10.05	0.00340	30240	1.00	0.00%	0.00%	10.00%	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00	0.00	452.59	0.00	0.00	226.29	0.00	0.00	0.00	678.88
Xylol	7.24	0.00080	30240	1.00	0.00%	0.00%	0.00%	0.00%	25.00%	90.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	191.79	690.44	0.00	0.00	0.00	767.16
Valex Beige #770H/ Enamel	12.43	0.00340	30240	1.00	0.00%	0.00%	0.00%	0.02%	0.00%	9.00%	1.00%	0.00%	0.00%	0.00	0.00	0.00	1.12	0.00	503.79	55.98	0.00	0.00	560.88
S-150	7.49	0.00080	30240	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	11.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	87.30	0.00	87.30
Polychron III Hartford Green	10.20	0.00380	30240	1.00	0.00%	0.00%	5.00%	1.00%	0.00%	10.00%	0.00%	0.00%	0.00%	0.00	0.00	256.69	51.34	0.00	513.38	0.00	0.00	0.00	821.41
Xylol	7.24	0.00040	30240	1.00	0.00%	0.00%	0.00%	0.00%	25.00%	90.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	95.89	345.22	0.00	0.00	0.00	383.58
Polyceram 1400 Pella White	11.35	0.00350	30240	1.00	0.00%	0.19%	0.00%	0.06%	1.24%	5.31%	0.00%	0.00%	0.00%	0.00	10.00	0.00	3.16	65.24	279.39	0.00	0.00	0.00	357.79
Xylol	7.24	0.000700	30240	1.00	0.00%	0.00%	0.00%	0.00%	25.00%	90.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	167.82	604.14	0.00	0.00	0.00	671.26

Total State Potential Emissions

TOTALS:	**(tons/yr):**	**142**	**665**	**1371**	**51.3**	**454**	**1650**	**184**	**120**	**3.40**	**2772**
	(lb/hr):	**32.3**	**152**	**313**	**11.7**	**104**	**377**	**42.1**	**27.4**	**0.777**	**633**
	(g/sec):	**4.07**	**19.1**	**39.4**	**1.48**	**13.1**	**47.5**	**5.30**	**3.45**	**0.098**	**79.7**

METHODOLOGY
HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Federal Potential Emissions Calculations
VOC and HAPs
From Cleanup Operations Associated With Surface Coating

Company Name: Capitol Products Corporation
Plant Location: 508 W. Wilson Street, Kentland, Indiana 47951
Part 70: T111-5887
Plt ID: 111-00005
County: Newton
Permit Reviewer: CarrieAnn Ortolani
Date: May 16, 1996

Material	Density (lb/gal)	Weight % Volatile (Organics)	Usage Rate (gal/yr)	Weight % Xylene	Weight % MEK	Weight % Glycol Ether	Weight % Ethyl benzene	Weight % Naphthalene	Potential VOC tons per year	Potential Xylene tons per year	Potential MEK tons per year	Potential Glycol Ether tons per year	Potential Ethyl benzene tons per year	Potential Naphthalene tons per year	Total HAPs tons per year
Xylene	7.24	100.00%	6855	90.00%	0.00%	0.00%	25.00%	0.00%	24.82	22.33	0.00	0.00	6.20	0.00	24.82
Solvent 150	7.49	100.00%	381	0.00%	0.00%	0.00%	0.00%	11.00%	1.43	0.00	0.00	0.00	0.00	0.16	0.16
Butyl Carbitol	7.95	100.00%	141	0.00%	0.00%	100.00%	0.00%	0.00%	0.56	0.00	0.00	0.56	0.00	0.00	0.56
MEK	6.72	100.00%	737	0.00%	100.00%	0.00%	0.00%	0.00%	2.48	0.00	2.48	0.00	0.00	0.00	2.48
								Totals:	**29.3**	22.3	2.48	0.560	6.20	0.157	**28.0**

State Potential Emissions

METHODOLOGY

Potential VOC Tons per Year = Density of coating (lb/gal) * Weight percent Volatile * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Potential HAP Tons per Year = Density of coating (lb/gal) * Weight percent HAP * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Appendix A: Emissions Calculations
Anodizing of Aluminum Parts

Company Name: Capitol Products Corporation
Plant Location: 508 W. Wilson Street, Kentland, Indiana 47951
Part 70: T111-5887
Plt ID: 111-00005
County: Newton
Permit Reviewer: CarrieAnn Ortolani
Date: May 16, 1996

Tank Number	Material	Emissions (lb water/ ft2-hr)	Surface area (ft2)	mol water	mol material	solution strength divided by 100	Adjusted mol water	Adjusted mol material	Mol Fraction	PM Emissions (lbs/hr)	PM Emissions (tons/yr)	PM Control Efficiency (%)	PM Controlled Emissions (lbs/hr)	PM Controlled Emissions (tons/yr)
1	caustic cleaner/ water	0.067	120	3061.45	253.97	0.50	3194.55	126.98	0.040	0.320	1.40	0.0%	0.320	1.40
3	NaOH/ water	0.067	150	4216.28	17.77	0.50	4236.03	8.89	0.002	0.021	0.092	99.0%	0.000	0.001
6	nitric acid/ water	0.067	90	2133.66	80.32	0.67	2259.06	53.81	0.024	0.144	0.629	0.0%	0.144	0.629
6	phosphoric acid/ water	0.067	90	2133.66	42.72	0.80	2233.48	34.18	0.015	0.092	0.404	0.0%	0.092	0.404
6	sulfuric acid/ water	0.067	90	2133.66	16.81	0.93	2180.08	15.64	0.007	0.043	0.189	0.0%	0.043	0.189
9	phosphoric acid/ water	0.067	120	97500	774.71	0.80	2785.25	619.77	0.223	1.789	7.84	99.0%	0.018	0.078
9	nitric acid/ water	0.067	120	97500	38.56	0.67	1035.20	25.83	0.025	0.201	0.879	99.0%	0.002	0.009
10	phosphoric acid/ water	0.067	105	1819.74	358.86	0.80	2658.28	287.09	0.108	0.760	3.33	99.0%	0.008	0.033
10	nitric acid/ water	0.067	105	1819.74	18.74	0.67	1849.00	12.56	0.007	0.048	0.209	99.0%	0.0005	0.002
13	sulfuric acid/ water	0.067	120	2107	80.18	0.93	2512.99	74.57	0.030	0.239	1.04	99.0%	0.002	0.010
15	sulfuric acid/ water	0.067	120	2107	80.18	0.93	2512.99	74.57	0.030	0.239	1.04	99.0%	0.002	0.010
19	sulfuric acid/ water	0.067	120	2502.86	9.16	0.93	2549.26	8.52	0.003	0.027	0.118	0.0%	0.027	0.118
19	colormax/ water	0.067	120	2221.01	92.82	1.00	2221.01	92.82	0.042	0.336	1.47	0.0%	0.336	1.47
22	erric sodium oxalate/ wat	0.067	105	2707.78	45.18	1.00	2707.78	45.18	0.017	0.117	0.514	0.0%	0.117	0.514
25	hydrogen fluoride/ water	0.067	105	2907.51	0.75	1.00	2907.51	0.75	0.0003	0.002	0.008	0.0%	0.002	0.008
25	nickel fluoride/ water	0.067	105	2975.58	0.43	1.00	2975.58	0.43	0.0001	0.001	0.004	0.0%	0.001	0.004
26	hydrogen fluoride/ water	0.067	105	2907.51	0.75	1.00	2907.51	0.75	0.0003	0.002	0.008	0.0%	0.002	0.008
26	nickel fluoride/ water	0.067	105	2975.58	0.43	1.00	2975.58	0.43	0.0001	0.001	0.004	0.0%	0.001	0.004
									Totals:	3.97	17.4		0.951	4.16

Pollutant	Uncontrolled Emissions (tons/yr)
HF	0.016
Ni	0.009

Pollutant	Uncontrolled Emissions Tank 6 (tons/yr)	Uncontrolled Emissions Tanks 9 and 10 (tons/yr)	Control Efficiency Tank 6 (%)	Control Efficiency Tanks 9 and 10 (%)	Controlled Emissions Tank 6 (tons/yr)	Controlled Emissions Tanks 9 and 10 (tons/yr)	Controlled Emissions Total (tons/yr)
NOx	0.629	1.09	0.0%	50.0%	0.629	0.544	1.17

Methodology

Emission equations from E.S Thomas "Evacuation Distances for Spills of Hazardous Materials" in Proceedings of the 1984 Hazardous Materials Spills Conference
Emissions (lb water/ft2-hr) = 9.69E4*[Vapor pressure water^4/3 * molecular weight water]^0.60327
Uncontrolled Emissions (lb pollutant/hr) = Emissions (lb water/ ft2-hr) * surface area * adjusted mol fraction
Controlled Emissions (lb pollutant/hr) = Uncontrolled emissions * (1-control efficiency)
Emissions (tons/yr) = Emissions (lbs/hr) * 8760 hrs/yr / 2,000 lbs/ton

Appendix A: Emission Calculations
Natural Gas Combustion Only
MM Btu/hr 0.3 - < 10
Commercial Boiler

Company Name: Capitol Products Corporation
Address City IN Zip: 508 W. Wilson Street, Kentland, Indiana 47951
Part 70: T 111-5887
Plt ID: 111-00005
Reviewer: CarrieAnn Ortolani
Date: May 16, 1996

SIGNIFICANT EMISSION UNITS

Billet Heater H

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
8.0	70.1

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	12.0	12.0	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.420	0.420	0.021	3.50	0.186	0.736

Paint Bake Oven P

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
9.0	78.8

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	12.0	12.0	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.473	0.473	0.024	3.94	0.209	0.828

Anodizing Boiler

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
8.4	73.6

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	12.0	12.0	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.442	0.442	0.022	3.68	0.195	0.773

INSIGNIFICANT ACTIVITIES

Billet Heater F and G

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
10.8	94.6

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	12.0	12.0	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.568	0.568	0.028	4.73	0.251	0.993

Aging Ovens I and J

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
6.6	57.8

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	12.0	12.0	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.347	0.347	0.017	2.89	0.153	0.607

Heaters L, M and N

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
9.0	78.8

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	12.0	12.0	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.473	0.473	0.024	3.94	0.209	0.828

Dryoff Oven O

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
2.6	22.8

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	12.0	12.0	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.137	0.137	0.007	1.14	0.060	0.239

Building Heaters A through E

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
25.7	225

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	12.0	12.0	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	1.35	1.35	0.068	11.3	0.597	2.36

		PM	PM10	SO2	NOx	VOC	CO
Potential Emissions Significant Units	TPY	1.34	1.34	0.067	11.1	0.590	2.34
Potential Emissions Insignificant	TPY	2.88	2.88	0.144	24.0	1.27	5.03
Total Potential emissions	TPY	4.21	4.21	0.211	35.1	1.86	7.37

Methodology

MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors for NOx: uncontrolled = 100, Low NOx Burner = 17, Flue gas recirculation = 36
Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emission Calculations
LPG-Propane - Commercial Boilers
(Heat input capacity: > .3 MMBtu/hr and < 10 MMBtu/hr)

Company Name: Capitol Products Corporation
Address City IN Zip: 508 W. Wilson Street, Kentland, Indiana 47951
Part 70: T111-5887
Plt ID: 111-00005
Reviewer: CarrieAnn Ortolani
Date: May 16, 1996

Billet Heater H

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	SO2 Emission factor = 0.10 x S S = Weight % Sulfur =
8.0	745.53	0.01

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	0.4	0.4	0.001 *(0.10S)*	14.0	0.5	1.9
Potential Emission in tons/yr	0.149	0.149	0.0005	5.22	0.186	0.708

Paint Bake Oven P

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	SO2 Emission factor = 0.10 x S S = Weight % Sulfur =
9.0	838.72	0.01

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	0.4	0.4	0.001 *(0.10S)*	14.0	0.5	1.9
Potential Emission in tons/yr	0.168	0.168	0.0005	5.87	0.210	0.797

Anodizing Boiler

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	SO2 Emission factor = 0.10 x S S = Weight % Sulfur =
8.4	782.81	0.01

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	0.4	0.4	0.001 *(0.10S)*	14.0	0.5	1.9
Potential Emission in tons/yr	0.157	0.157	0.0005	5.48	0.196	0.744

INSIGNIFICANT ACTIVITIES

Billet Heater F and G

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	SO2 Emission factor = 0.10 x S S = Weight % Sulfur =
10.8	1006.47	0.01

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	0.4	0.4	0.001 *(0.10S)*	14.0	0.5	1.9
Potential Emission in tons/yr	0.201	0.201	0.001	7.05	0.252	0.956

Aging Ovens I and J

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	SO2 Emission factor = 0.10 x S S = Weight % Sulfur =
6.6	615.06	0.01

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	0.4	0.4	0.001 *(0.10S)*	14.0	0.5	1.9
Potential Emission in tons/yr	0.123	0.123	0.0004	4.31	0.154	0.584

Heaters L, M and N

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	SO2 Emission factor = 0.10 x S S = Weight % Sulfur =
9.0	838.72	0.01

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	0.4	0.4	0.001 *(0.10S)*	14.0	0.5	1.9
Potential Emission in tons/yr	0.168	0.168	0.001	5.87	0.210	0.797

Dryoff Oven O

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	SO2 Emission factor = 0.10 x S S = Weight % Sulfur =
2.6	242.30	0.01

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	0.4	0.4	0.001 *(0.10S)*	14.0	0.5	1.9
Potential Emission in tons/yr	0.048	0.048	0.0001	1.70	0.061	0.230

Building Heaters A through E

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	SO2 Emission factor = 0.10 x S S = Weight % Sulfur =
25.7	2395.02	0.01

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	0.4	0.4	0.001 *(0.10S)*	14.0	0.5	1.9
Potential Emission in tons/yr	0.479	0.479	0.001	16.8	0.599	2.28

		PM	PM10	SO2	NOx	VOC	CO
Potential Emissions Significant Units	TPY	0.473	0.473	0.001	16.6	0.592	2.249
Potential Emissions Insignificant	TPY	1.02	1.02	0.003	35.7	1.27	4.84
Total Potential emissions	TPY	1.49	1.49	0.005	52.3	1.87	7.09

Methodology

1 gallon of LPG has a heating value of 94,000 Btu
Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.094 MMBtu
Emission Factors are from AP42, Fifth Edition (January 1995), Table 1.5-2 (SCC #1-02-010-02)
Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2,000 lb/ton